

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JOSE ANTONIO MORALES NIEVES	:	VIOLATIONS:
a/k/a "Flaco,"	:	21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A),
RAMON ROMAN-MONTANEZ	:	(b)(1)(B), (b)(1)(C) (conspiracy to
a/k/a "Viejo,"	:	distribute controlled substances – 1
NANCY RIOS-VALENTIN	:	count)
JOEL CARRILLO-CRESPO	:	21 U.S.C. § 841(a)(1), (b)(1)(A)
a/k/a "Jowey,"	:	(attempted possession with the intent
LUIS LEVANTE-MEDINA	:	to distribute 400 grams or more of
a/k/a "Diamante,"	:	fentanyl – 2 counts)
CHAYANNE HERRERA	:	21 U.S.C. § 841(a)(1), (b)(1)(B),
a/k/a "Cito,"	:	(b)(1)(C) (possession with the intent to
KELVIN AGUAYO-GARCIA	:	distribute controlled substances or
a/k/a "Negro,"	:	distribution of controlled substances –
ELLIOT MATTEI-RODRIGUEZ	:	7 counts)
a/k/a "Elio,"	:	21 U.S.C. § 841(a)(1), (b)(1)(C)
SANDINO JOSE HIDALGO GENAO	:	(distribution of controlled substances –
a/k/a "Domí,"	:	29 counts)
JOSUE ONEIL ORTIZ-BETANCOURT	:	18 U.S.C. § 922(g)(1) (felon in
a/k/a "Oneil,"	:	possession of a firearm – 1 count)
ANGEL RIOS-VALENTIN	:	18 U.S.C. § 371 (conspiracy to sponsor
JUAN GOMEZ-RESTO	:	or exhibit an animal and to possess an
a/k/a "Pupo,"	:	animal for an animal fighting venture
JAVIER RESTO-BERRIOS	:	– 1 count)
a/k/a "Chicken,"	:	18 U.S.C. § 2 (aiding and abetting)
RICHARD CARTAGENA	:	Notices of forfeiture
a/k/a "Richie,"	:	
ELIUD OMAR MORALES-GARCIA	:	
a/k/a "Chochin,"	:	
ANGEMILL GONZALEZ-CLAUDIO	:	
a/k/a "Angel,"	:	
a/k/a "Angie,"	:	
JOHN DAVID LOPEZ-BORIA	:	
a/k/a "Grande,"	:	
JONATHAN TORRES	:	
EDERICK RIVERA SANTIAGO-	:	
GONZALEZ	:	
a/k/a "Edri,"	:	
a/k/a "Negro,"	:	

JANDANIEL VELEZ-GONZALEZ	:
a/k/a "Jan,"	
WILFRED CASTILLO	:
a/k/a "Domi,"	
HECTOR VEGA-MELENDEZ	:
a/k/a "Tito,"	
JULIO JOSE RAMIREZ-DIAZ	:
a/k/a "June,"	
CARLA DIAZ-RESTO	:
a/k/a "Karla,"	
MAYRA MOLINA DEJESUS	:
a/k/a "Rubia,"	
JAIME OTERO-RODRIGUEZ	:
a/k/a "Pilon,"	
JOSE SANTANA-GONZALEZ	:
a/k/a "Chipi,"	
a/k/a "Chepo,"	:
LUIS WILLIAMS	
a/k/a "Prendi Pas,"	:
SONIA RAMOS DE JESUS	
ADELEDA GONZALEZ	:
a/k/a "Moya,"	
LUIS CRUZ	:
JOSE CANDIDO HIDALGO	
GENAO	:
JIANNI CRUZ SANTOS	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about January 2016 through in or about October 2025, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

JOSE ANTONIO MORALES NIEVES,
a/k/a "Flaco,"
RAMON ROMAN-MONTANEZ,
a/k/a "Viejo,"
NANCY RIOS-VALENTIN,
JOEL CARRILLO-CRESPO,
a/k/a "Jowey,"
LUIS LEVANTE-MEDINA,

a/k/a "Diamante,"
CHAYANNE HERRERA,
a/k/a "Cito,"
KELVIN AGUAYO-GARCIA,
a/k/a "Negro,"
ELLIOT MATTEI-RODRIGUEZ,
a/k/a "Elio,"
SANDINO JOSE HIDALGO GENAO,
a/k/a "Domi,"
JOSUE ONEIL ORTIZ-BETANCOURT,
a/k/a "Oneil,"
ANGEL RIOS-VALENTIN,
JUAN GOMEZ-RESTO,
a/k/a "Pupo,"
JAVIER RESTO-BERRIOS,
a/k/a "Chicken,"
RICHARD CARTAGENA,
a/k/a "Richie,"
ELIUD OMAR MORALES-GARCIA,
a/k/a "Chochin,"
ANGEMILL GONZALEZ-CLAUDIO,
a/k/a "Angel,"
a/k/a "Angie,"
JOHN DAVID LOPEZ-BORIA,
a/k/a "Grande,"
JONATHAN TORRES,
EDERICK RIVERA SANTIAGO-GONZALEZ,
a/k/a "Negro,"
a/k/a "Edri,"
JANDANIEL VELEZ-GONZALEZ,
a/k/a "Jan,"
WILFRED CASTILLO,
a/k/a "Domi,"
HECTOR VEGA-MELENDEZ,
a/k/a "Tito,"
JULIO JOSE RAMIREZ-DIAZ,
a/k/a "June,"
CARLA DIAZ-RESTO,
a/k/a "Karla,"
MAYRA MOLINA DEJESUS,
a/k/a "Rubia,"
JAIME OTERO-RODRIGUEZ,
a/k/a "Pilon,"
JOSE SANTANA-GONZALEZ,
a/k/a "Chipi,"
a/k/a "Chepo,"

**LUIS WILLIAMS,
a/k/a “Prendi Pas,”
SONIA RAMOS DE JESUS,
ADELEDA GONZALEZ,
a/k/a “Moya,”
LUIS CRUZ,
JOSE CANDIDO HIDALGO GENAO,
and
JIANNI CRUZ SANTOS**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance; a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; and a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. It is further alleged that, with respect to the conspiracy charged in this Count, 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, is attributable to and was reasonably foreseeable to defendants JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco,” RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” NANCY RIOS-VALENTIN, KELVIN AGUAYO-GARCIA, a/k/a “Negro,” ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” SANDINO JOSE HIDALGO GENAO, a/k/a “Domi,” JOSUE ONEIL ORTIZ-BETANCOURT, a/k/a “Oneil,” JUAN GOMEZ-RESTO, a/k/a “Pupo,” JAVIER RESTO-BERRIOS, a/k/a “Chicken,” RICHARD CARTAGENA, a/k/a “Richie,” ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin,” ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,”

a/k/a “Angie,” JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” JONATHAN TORRES, EDERICK RIVERA SANTIAGO-GONZALEZ, a/k/a “Negro,” a/k/a “Edri,” JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan,” JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” ADELEDA GONZALEZ, a/k/a “Moya,” JOSE CANDIDO HIDALGO GENAO, and JIANNI CRUZ SANTOS, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A). It is further alleged that 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, is attributable to and was reasonably foreseeable to defendant LUIS WILLIAMS, a/k/a “Prendi Pas,” in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

3. It is further alleged that, with respect to the conspiracy charged in this Count, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, is attributable to and was reasonably foreseeable to defendants JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco,” JOEL CARRILLO-CRESPO, a/k/a “Jowey,” LUIS LEVANTE-MEDINA, a/k/a “Diamante,” CHAYANNE HERRERA, a/k/a “Cito,” KELVIN AGUAYO-GARCIA, a/k/a “Negro,” and ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

4. It is further alleged that, with respect to the conspiracy charged in this Count, 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, is attributable to and was reasonably foreseeable to defendants JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco,” RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” NANCY RIOS-VALENTIN, JOEL CARRILLO-CRESPO, a/k/a “Jowey,” LUIS LEVANTE-MEDINA, a/k/a “Diamante,” CHAYANNE HERRERA, a/k/a “Cito,” KELVIN AGUAYO-GARCIA, a/k/a “Negro,” ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,”

JUAN GOMEZ-RESTO, a/k/a “Pupo,” JAVIER RESTO-BERRIOS, a/k/a “Chicken,” RICHARD CARTAGENA, a/k/a “Richie,” JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan,” in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A). It is further alleged that 28 grams or more of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, is attributable to and was reasonably foreseeable to defendant ANGEL RIOS-VALENTIN, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

5. Before defendant JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco,” committed the offense charged in this count, defendant MORALES NIEVES had a final conviction for a serious violent felony, that is, a conviction on December 17, 2004, in the Eastern District of Pennsylvania for Hobbs Act Robbery and using a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Section 1951 and Title 18, United States Code, Section 924(c), for which he served more than 12 months of imprisonment.

6. Before defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey,” committed the offense charged in this count, defendant CARRILLO-CRESPO had a final conviction for a serious violent felony, that is, a conviction on November 24, 2003, in the Commonwealth of Pennsylvania for Murder, in violation of 18 Pa. C.S.A. § 2502, for which he served more than 12 months of imprisonment.

7. Before defendant ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” committed the offense charged in this count, defendant GONZALEZ-CLAUDIO had a final conviction for a serious drug felony, that is, a conviction on November 6, 2014, in the Commonwealth of Pennsylvania for the manufacture, delivery, or possession with intent to manufacture or deliver, a controlled substance in violation of 35 Pa. C.S.A. § 780-113 (a)(30), for

which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the offense charged in this count.

8. Before defendant JULIO JOSE RAMIREZ-DIAZ, a/k/a “June,” committed the offense charged in this count, defendant RAMIREZ-DIAZ had a final conviction for a serious drug felony, that is, a conviction on June 16, 2016, in the Commonwealth of Pennsylvania for the manufacture, delivery, or possession with intent to manufacture or deliver, a controlled substance in violation of 35 Pa. C.S.A. § 780-113 (a)(30), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the offense charged in this count.

MANNER AND MEANS

It was part of the conspiracy that:

9. The 3100 block of Weymouth Street was the primary territory for the Weymouth Street Drug Trafficking Organization (hereinafter “Weymouth DTO”). The 3100 block of Weymouth is located in North Philadelphia in the Kensington portion of the city. It functioned as an open-air drug market where fentanyl, heroin, cocaine base (“crack”), and cocaine were sold every day of the week and at all hours of the day. The physical block was protected and was the exclusive territory of the Weymouth DTO. The block, and in turn the Weymouth DTO, was one of the most prolific drug blocks in the city.

10. The Weymouth DTO had an established schedule. This schedule was distributed by the leaders of the Weymouth DTO. Historically this schedule was written down, but it could also be conveyed verbally or by phone. The schedule established which member of the

Weymouth DTO would be working which day and at what times. An example of this schedule is set forth below.

The image shows a handwritten schedule on a piece of paper, divided into four sections labeled '1-Semester', '2-Semester', '3-Semester', and '4-Semester'. Each section contains a table with columns for days (Sun, Mon, Tue, Wed, Thu, Fri, Sat, Sun) and rows for specific dates (7-3, 3-12, 12-7). The names of the members are written in the cells, indicating who is working on which day.

Semester	Day	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun
1-Semester	7-3	Roy	Don	Ron	Joe	Uan	SA	Qam	
	3-12	ESL	ESL	ESL	Wasa	Ang	IL	Ron	
	12-7	Eli	Mari	Eli	Pansa	Ivan	Nan	Mary	
2-Semester	7-3	Nan	Mari	Roy	Eli	Ivan	Ram	Omar	
	3-12	ESL	ESL	Ang	Ich	Eli	Ang	Ron	
	12-7	Pansa	Eli	Mari	Nan	Eli	Ivan	Mari	
3-Semester	7-3	Ron	Don	Mari	Roy	Nan	Eli	Ivan	
	3-12	ESL	ESL	Ich	Ang	Ang	Eli	Ron	
	12-7	Nan	Mari	Pansa	Eli	Ivan	Mari	Eli	
4-Semester	7-3	Mari	Eli	Ivan	Pansa	Omar	Nan	Roy	
	3-12	ESL	ESL	Ang	Ich	Eli	Ang	Ron	
	12-7	Eli	Ivan	Mari	Nan	Pansa	Eli	Mari	

11. Weymouth DTO members would not always personally work their shift but rather they recruited other members to work the shift for them. In turn, the Weymouth DTO member originally assigned to a particular shift would be given a portion of the drug proceeds from that shift and the DTO member that was not originally assigned would get a portion of the proceeds from the shift.

12. Members of the Weymouth DTO had well defined roles. These roles included the owner of the block, case workers, hustlers or street level dealers, runners or the reup

coordinator, lookouts, leaders, and enforcers. These roles were not exclusive, and one person at times could have multiple roles. These roles are further defined below:

- a. The block owner maintained control of the physical block. This person was paid “rent” by others in the organization (who manage and/or conduct the day-to-day drug-trafficking operations at the street level) in exchange for the right to sell narcotics on the block.
- b. A leader was an individual responsible for the management of the block’s entire affairs, including managing proceeds, obtaining controlled substances and making the schedule.
- c. An enforcer carried out acts of violence for the DTO to enforce the groups’ rules, retaliate against other DTOs and/or protect their drug territory.
- d. A reup coordinator or runner was a person responsible for bringing a resupply of drugs to the block when it was running low on drug supply. This person was usually told by a leader or a case worker that the “work” or drug supply was low and the reup person/runner must go to the supplier or a nearby stash location to acquire more drugs to sell.
- e. A case worker was a person who oversaw the handling of proceeds and drugs during a designated time. The hustlers or street level dealers reported to the case worker and turned over the drug proceeds that they did not retain for themselves as payment. The case worker managed drugs stashed on the block and coordinated with others on ensuring that the block was resupplied when the drug stash ran low.
- f. Hustlers or street dealers were individuals who engaged in the hand-to-hand transactions with buyers/customers to provide drugs for money. These individuals were usually paid out of the portion of what they sold. For example, if they sold a “bundle” of fentanyl

(which was usually comprised of 12-14 packets of fentanyl) they would keep the proceeds of some percentage of that transaction (for example the proceeds from 2-3 packets). The rest was given to the case worker, who then retained a portion of the proceeds and eventually provided the remainder to higher-level leaders of the DTO.

g. Lookouts were individuals whose job was to be on the lookout for and warn about police presence.

h. Packaging or stash-house operators were individuals who helped package and store controlled substances for the DTO at an off-block location, so that the DTO had an inventory of ready-to-sell supply of controlled substances that could be brought to the block.

13. The 3100 block of Weymouth was owned by defendant JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco.” Defendant MORALES NIEVES did not legally own the block but rather authorized other members of the Weymouth DTO to sell drugs on his block in exchange for “rent.” Defendant MORALES NIEVES helped protect the members of the DTO through the threat of violent acts performed personally by defendant MORALES NIEVES or his associates against others who caused the Weymouth DTO harm or who attempted to sell controlled substances in the DTO’s territory.

14. Defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” was a leader of the Weymouth DTO and managed the street-level operations. Defendant ROMAN-MONTANEZ was the brother-in-law of Co-Conspirator 1, the former leader of the Weymouth DTO who was murdered in November 2024 and is known to the grand jury. Defendant ROMAN-MONTANEZ was also romantically involved with defendant NANCY RIOS-VALENTIN. As the leader of the street level operations for the Weymouth DTO, defendant ROMAN-MONTANEZ was responsible for organizing the drug shift schedule, which established roles and shifts for who in the Weymouth

DTO would be responsible for selling drugs at what times and what days, managing proceeds and obtaining more controlled substances.

15. Defendant NANCY RIOS-VALENTIN was romantically involved with defendant ROMAN-MONTANEZ and was a sister of Co-Conspirator 1. Defendant NANCY RIOS-VALENTIN was also a leader of the Weymouth DTO and was responsible for organizing the drug shift schedule as well as managing and maintaining drug proceeds.

16. Defendants JOEL CARRILLO-CRESPO, a/k/a “Jowey,” LUIS LEVANTE-MEDINA, a/k/a “Diamante,” and CHAYANNE HERRERA, were leaders for the DTO who had connections to suppliers to provide the Weymouth DTO with controlled substances which, up through at least August 2025, were packaged and stored for the DTO at a garage located at 3326 Rorer Street, Philadelphia.

17. Defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” was a leader and a runner or reup coordinator for the Weymouth DTO.

18. Defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” was a leader, case worker, and enforcer for the Weymouth DTO.

19. Defendant SANDINO JOSE HIDALGO GENAO, a/k/a “Domi,” was a packager and stash-house operator for the Weymouth DTO. Up through August 2025, defendant SANDINO JOSE HIDALGO GENAO would take bulk amounts of controlled substances and then package them for street level distribution at an off-block location, at 6217 Tackawanna Street, in Philadelphia, where the controlled substances were stored for future use by the DTO.

20. Defendant JOSUE ONEIL ORTIZ-BETANCOURT was an enforcer and case worker for the Weymouth DTO.

21. Defendants ANGEL RIOS-VALENTIN and JUAN GOMEZ-RESTO, a/k/a “Pupo,” were leaders for the DTO and had connections to suppliers who provided the Weymouth DTO with controlled substances.

22. Defendant RICHARD CARTAGENA, a/k/a “Richie,” was a runner/reup coordinator for the Weymouth DTO.

23. Defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin,” was a runner/reup coordinator and a case worker for the Weymouth DTO.

24. Defendants JAVIER RESTO-BERRIOS, a/k/a “Chicken,” ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” JONATHAN TORRES, EDERICK RIVERA SANTIAGO-GONZALEZ, a/k/a “Negro,” a/k/a “Edri,” JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan,” WILFRED CASTILLO, a/k/a “Domi,” HECTOR VEGA-MELENDEZ, a/k/a “Tito,” JULIO JOSE RAMIREZ-DIAZ, a/k/a “June,” and CARLA DIAZ-RESTO, a/k/a “Karla,” were case workers and hustlers/street dealers for the Weymouth DTO.

25. Defendants MAYRA MOLINA DEJESUS, a/k/a “Rubia,” and JAIME OTERO-RODRIGUEZ, a/k/a “Pilon,” were case workers for a drug-operation that the Weymouth DTO controlled on a neighboring block corner, located at F Street and Clementine Street, in Philadelphia.

26. Defendants JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” LUIS WILLIAMS, a/k/a “Prendi Pas,” SONIA RAMOS DE JESUS, ADELEDA GONZALEZ, a/k/a “Moya,” and LUIS CRUZ were hustlers/street level dealers for the Weymouth DTO.

27. Defendants JOSE CANDIDO HIDALGO GENAO and JIANNI CRUZ SANTOS packaged controlled substances with defendant SANDINO JOSE HIDALGO GENAO at the off-block bag house located on Tackawanna Street.

28. While the 3100 block of Weymouth Street was the nucleus of the group's operations, their area of operations extended to include the corner located at F Street and Clementine Street, the corner located at E Street and Wishart Street, and 3000 Potter Street, all in Philadelphia.

29. The Weymouth DTO used firearms and violence to control and maintain its territory. This violence involved shootings, murder, and physical assaults. Members of the Weymouth DTO retaliated against witnesses that the DTO believed provided information to law enforcement and would commit violent acts against members of rival organizations. Violence inspired more loyalty among all members of the Weymouth DTO and intimidated rival drug-trafficking organizations, through the threat of future additional violence against those who tried to compete with the Weymouth DTO.

30. Members of the Weymouth DTO utilized various stash and packaging houses in the Philadelphia area. The stash houses were primarily used to temporarily store controlled substances on the 3100 block of Weymouth, and in nearby locations, although they were also occasionally used as places where the DTO packaged narcotics. To motor the daily drug sales on the 3100 block of Weymouth Street and adjacent blocks controlled by the organization, members of the Weymouth DTO used multiple occupied and abandoned houses and lots on these blocks—as well as trash cans, ground drains, cars, tires, and porches—to store small to medium amounts of drugs in easily-accessible places, so that drugs could be procured for buyers who would arrive to make drug transactions. In addition, when storing drugs within rowhomes, such as within

3150 and 3152 Weymouth Street, members of the Weymouth DTO stashed drugs in all sorts of hidden locations in the dwelling units, such as in air vents, kitchen ceilings, and corn buckets used to store food for roosters.

31. The following properties were stash houses used by the Weymouth DTO. Listed below are examples of various times members of the Weymouth DTO stashed controlled substances at these locations that they intended to distribute, and/or stored firearms used to protect the controlled substances, drug proceeds, and other members of the DTO:

a. 3110 Weymouth Street:

On April 16, 2024, members of the Weymouth DTO stashed approximately 149 packets of cocaine base (“crack”), weighing a total of approximately 37.2 grams, and approximately 1,036 flip-top containers of cocaine base (“crack”), weighing a total of approximately 90.7 grams, at the property, that was destined for distribution.

b. 3115 Weymouth Street:

i. On March 12, 2025, members of the Weymouth DTO stashed approximately 884 flip-top containers of cocaine base (“crack”)cocaine base (“crack”), weighing a total of approximately 78.6 grams, approximately 397 packets of fentanyl stamped “GRINCH,” weighing a total of approximately 12.20 grams, and approximately 24.9 grams of cocaine, in containers and packets, at the property, that was destined for distribution.

ii. On August 8, 2025, members of the Weymouth DTO stashed approximately 630 packets of fentanyl/heroin stamped “RIC FLAIR,” approximately 150 packets of fentanyl/heroin stamped “GRINCH,” and 196 containers of cocaine base (“crack”), at the property, that was destined for distribution.

c. 3116 Weymouth Street:

i. On March 28, 2023, members of the Weymouth DTO stashed approximately 45 containers of cocaine base (“crack”), at the property, that was destined for distribution.

ii. On March 8, 2024, members of the Weymouth DTO stashed approximately 52 containers of cocaine base (“crack”), and approximately 11 packets of cocaine, at or near the property, that was destined for distribution.

iii. On March 12, 2025, members of the Weymouth DTO stashed approximately 63 containers of cocaine base (“crack”), at the property, that was destined for distribution.

iv. On July 17, 2025, members of the Weymouth DTO stashed approximately 14 containers of cocaine base (“crack”), at or near the property, that was destined for distribution.

d. 3122 Weymouth Street:

On August 18, 2024, members of the Weymouth DTO stashed approximately 40 bags of heroin/fentanyl, and approximately 28 containers of cocaine base (“crack”) outside 3122 Weymouth Street, at the property, that was destined for distribution.

e. 3125 Weymouth Street:

i. On January 23, 2019, members of the Weymouth DTO stashed a Taurus PT99 AF 9mm semi-automatic pistol, loaded with 16 live rounds of ammunition, a Smith & Wesson .38 Special revolver, bearing serial number #J75447, a Ruger LC9, 9mm semi-automatic pistol, bearing serial number #321-15519, loaded with 10 live rounds of ammunition, a box of .40 caliber ammunition, a box of .38 special ammunition, and two black magazines.

f. 3126 Weymouth Street:

i. On October 20, 2022, members of the Weymouth DTO stashed approximately 140 orange flip-top containers containing cocaine base (“crack”), a black and brown Draco AK 47, 7.62 caliber semi-automatic rifle, bearing serial number DR-8262-10, loaded with 31 live rounds of ammunition, and a black and green AR-15, aero model X15, semi-automatic rifle, bearing serial number X257462, with a double-drum magazine loaded with 80 live rounds of ammunition, on the roof or rear fence of this location.

ii. On January 25, 2024, members of the Weymouth DTO stashed approximately 84 packets of heroin/fentanyl, approximately 90 packets of cocaine, and approximately 28 containers of cocaine base (“crack”), at the property, that was destined for distribution.

iii. On May 17, 2024, members of the Weymouth DTO stashed approximately 330 packets of cocaine, weighing approximately 80.1 grams, approximately 1,409 packets of heroin/fentanyl, each stamped “HORSE POWER,” weighing approximately 54.4 grams, and additional quantities of cocaine base (“crack”) and packets of heroin/fentanyl, , at the property, that was destined for distribution.

iv. On June 16, 2024, an individual was shot outside 3126 Weymouth Street. Packets of suspected heroin/fentanyl were found on the shooting victim. Inside 3126 Weymouth Street, members of the DTO stashed numerous magazines and bulk ammunition, at the property.

v. On December 4, 2024, members of the Weymouth DTO stashed two firearms, a Pioneer Arms Co. 7.62 caliber semi-automatic pistol commonly referred to as a “Draco,” bearing serial number PAC115804221; and a Glock .40 caliber semi-automatic pistol, bearing serial number BZMK804, at the property.

g. 3131 Weymouth Street:

i. On February 5, 2025, members of the Weymouth DTO stashed approximately 72 packets of fentanyl, each stamped “Rolex,” weighing a total of approximately 1.64 grams, 30 packets of cocaine, weighing a total of approximately 8.97 grams, and two flip-top containers of cocaine base (“crack”), weighing a total of approximately 0.162 grams, at the property, all of which was intended for distribution.

ii. On February 25, 2025, members of the Weymouth DTO stashed approximately 31 packets of heroin/fentanyl and approximately 19 baggies of cocaine, at the property, that was destined for distribution.

iii. On March 9, 2025, members of the Weymouth DTO stashed approximately 81 packets of heroin/fentanyl and approximately 12 baggies of cocaine base (“crack”), at the property, that was destined for distribution.

h. 3132 Weymouth Street:

i. On February 11, 2023, members of the Weymouth DTO stashed on the porch of 3132, approximately 14 packets of heroin/fentanyl and approximately 37 containers of cocaine base (“crack”), at the property, that was destined for distribution..

ii. On June 21, 2023, members of the Weymouth DTO stashed approximately 43 packets of heroin/fentanyl, at the property, that was destined for distribution.

i. 3133 Weymouth Street:

i. On April 17, 2024, members of the Weymouth DTO stashed approximately 28 containers of cocaine base (“crack”), approximately 210 packets of cocaine, and approximately 1,440 packets of heroin/fentanyl, at the property, that was destined for distribution.

j. 3150 Weymouth Street:

i. On December 13, 2019, members of the Weymouth DTO stashed approximately 1,800 packets of cocaine, approximately 3,150 packets of heroin/fentanyl, at the property, that was destined for distribution, and magazines and various rounds of ammunition.

ii. On August 13, 2025, the Weymouth DTO stashed (i) approximately 5.45 grams of fentanyl/heroin, in packets of various stamps, that was intended for distribution; (ii) approximately 136 grams of cocaine base (“crack”), in capsules and cones, as well as in bulk, that was intended for distribution; and (iii) approximately 1,280 grams of powder cocaine, in various bags, baggies, and packages, at the property, that was destined for distribution.

k. 3151 Weymouth Street:

On December 13, 2019, members of the Weymouth DTO stashed approximately 1,148 packets of heroin/fentanyl, approximately 644 of suspected cocaine base (“crack”), and approximately 300 of packets of cocaine, at the property, that was destined for distribution.

l. 3152 Weymouth Street:

i. On April 7, 2018, members of the Weymouth DTO stashed approximately 1,508 packets of heroin stamped “Santa Muerte,” weighing a total of approximately 59 grams, and approximately 119 zip-lock packets of cocaine, stamped “Eight Ball,” weighing a total of approximately 26.9 grams, at the property, all of which was intended for distribution.

ii. On October 20, 2022, members of the Weymouth DTO stashed approximately 2,800 packets of fentanyl/heroin, stamped “Debo,” weighing a total of approximately 96 grams, as well as four firearms, each loaded, on the front porch of this residence.

iii. On August 13, 2025, members of the Weymouth DTO stashed approximately eight bundles, with a total of 112 packets of fentanyl/heroin, each stamped

“RIC FLAIR,” weighing a total of approximately 6 grams; (ii) bulk cocaine base (“crack”) and packaged cocaine base (“crack”), weighing a total of approximately 66.28 grams, at the property, that was intended for distribution; and (iii) ledger sheets; and (iv) over \$24,000 cash drug proceeds.

m. 3153 Weymouth Street:

On August 13, 2025, members of the Weymouth DTO stashed approximately 64.9 grams of fentanyl, packaged in hundreds of packets stamped “RIC FLAIR,” “Tesla,” “DEBO,” “Trident,” and “North Face,” as well as 117 grams of cocaine base (“crack”), at the property, that was destined for distribution.

n. 3154 Weymouth Street:

On March 29, 2024, members of the Weymouth DTO stashed approximately 16 packets of suspected heroin, at the property, that was destined for distribution.

o. 3457 N. Hope Street:

On April 9, 2025, members of the Weymouth DTO stashed approximately 785 packets of fentanyl/heroin, each stamped “GRINCH,” weighing approximately a total of 25 grams, approximately 812 blue plastic flip-top containers of cocaine base (“crack”), weighing a total of approximately 71.5 grams, and 23 grams of powder cocaine, at the property, that was destined for distribution.

p. 6217 Tackawanna Street:

On August 10, 2025, members of the Weymouth DTO stashed approximately 2,048 grams of fentanyl, at the property, that was destined for distribution.

q. 3326 Rorer Street:

On August 13, 2025, members of the Weymouth DTO stashed approximately 361 flip top containers containing cocaine base (“crack”), weighing a total of approximately 36 grams, and 1703 packets of cocaine, weighing a total of approximately 463 grams, at the property, that was destined for distribution.

32. The Weymouth DTO used a vacant lot at 3153 Weymouth Street as a meeting place, stash location, and location to cook cocaine base (“crack”). The location, called the “bunker,” consisted of a drywall structure with a physically connected tent structure, with a door in between that could be opened or closed.

33. Members of the Weymouth DTO routinely utilized cellular telephones and encrypted communication applications, such as WhatsApp and FaceTime, to discuss, coordinate, and complete drug trafficking transactions and operations in concert with one another. In an attempt to avoid detection and compartmentalize their drug trafficking business, the members of the conspiracy regularly used and carried multiple cellular phones, often changing cellular phones, and using separate cellular phones to communicate with different drug suppliers and customers.

34. In an effort to avoid detection by law enforcement, members of the Weymouth DTO spoke in coded language to refer to their drug trafficking activities. For example, members of the Weymouth DTO referred to drug proceeds as “tickets,” to heroin/fentanyl as “slow,” “lenta,” or “L,” to cocaine base (“crack”) as “rock,” to cocaine as “white,” and to police officers on foot patrol as “walkers.”

35. The Weymouth DTO sold controlled substances in differing quantities. The DTO would sometimes sell a single bag of fentanyl/heroin to a customer, containing anywhere from 0.015 to 0.03 grams of fentanyl/heroin, at a price of approximately \$5 per packet. Similarly, the Weymouth DTO would sometimes sell a single “trash can,” or flip top of cocaine base (“crack”) to

a user, containing approximately 0.1 grams of cocaine base (“crack”), at a price of approximately \$5 per flip top. A “trash can” was the name given to the small plastic flip top containers that hold the cocaine base (“crack”). The Weymouth DTO would also sell fentanyl/heroin in “bundles.” Bundles are individual bags of fentanyl/heroin that the Weymouth DTO would group together using a rubber band, at a price ranging from \$55 to \$70 per bundle. A bundle usually contained between 12 and 14 bags of fentanyl/heroin, with each bag, again, containing between 0.015 and 0.03 grams of fentanyl/heroin.

36. The Weymouth DTO used “stamps” to brand their fentanyl/heroin and throughout the period of the conspiracy, used many different stamps to trademark their product. Stamps are markings on the packets of fentanyl/heroin that denote a certain brand. These brands or stamps are known by customers and often associated with a particular DTO or a particular block. Stamps that were used by the Weymouth DTO for fentanyl/heroin include, “HORSE POWER,” “Santa Muerte,” “SHAMA,” “Rolex,” “GRINCH,” “RIFLAY,” “GUCCI,” “RIC FLAIR,” “SMOKE SHOP,” “White Bear,” “Mega Mind,” “OCHO BLANCO,” “DONALD TRUMP,” “DEBO,” and “Frank White.”

37. Members of the Weymouth DTO were surveillance-conscious and used advanced techniques to avoid law enforcement detection including, among other means, using phones not associated with their personal information (burner phones), identifying electronic surveillance and warning other members of the Weymouth DTO of its presence, employing evasive driving tactics to avoid law enforcement, utilizing lookouts to provide advance warning for law enforcement in the area, and consistently checking parking lots in the area where law enforcement is known to stage prior to law enforcement operations. These evasive techniques also included using back alleys. Members of the Weymouth DTO were well aware that law enforcement had

cameras constantly monitoring their drug territory. Because of this, the Weymouth DTO used the back alley between houses to disguise where their drug stashes were held. For example, a Weymouth DTO member would enter one property but immediately exit through the rear and enter another property where the controlled substances were stored. Weymouth DTO members discussed when law enforcement was in the area and warned one another about the possibility that law enforcement was on its way to the block to disrupt their drug-trafficking operation.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, the defendants, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about January 9, 2016:

a. From approximately 12:30 p.m. to 1:10 p.m., defendant ANGEL RIOS-VALENTIN stood on the corner of Weymouth Street and Allegheny Avenue and shouted “police” in Spanish, after a marked Philadelphia Police Department (“PPD”) vehicle drove down Weymouth Street.

b. At approximately 1:15 p.m., a person unknown to the grand jury sold one orange packet containing a blue glassine insert stamped “Mega Mind,” containing heroin, and one black-tinted plastic packet with a smiley face, containing cocaine, to a confidential human source utilized by the Philadelphia Police Department (hereinafter CHS-1), inside 3153 Weymouth Street. When CHS-1 went inside to make these drug purchases, defendant ANGEL RIOS-VALENTIN stood watch on the corner.

c. At approximately 1:35 p.m., defendant ANGEL RIOS-VALENTIN again yelled “police” in Spanish to warn his fellow DTO members that police were in the area, as a marked PPD vehicle drove by 3153 Weymouth Street.

d. Inside 3153 Weymouth Street, a location controlled by the Weymouth DTO, members of the Weymouth DTO possessed a pill bottle with eleven black tinted packets containing cocaine, each stamped with a smiley face, with a total approximate weight of 3.03 grams.

2. On or about August 27, 2016, law enforcement attempted to conduct a traffic stop of a vehicle on the 3100 block of Weymouth Street. In response to the police presence, defendant JOSE ANTONIO MORALES NIEVES approached the police officers in a threatening manner while carrying a shovel.

3. On or about January 21, 2017, defendant JUAN GOMEZ-RESTO, a/k/a “Pupo,” engaged in hand-to-hand drug transactions near 3149 Weymouth Street, during which he sold fentanyl/heroin stamped “Santa Muerte” to buyers. When defendant GOMEZ-RESTO was approached by law enforcement, he resisted arrest and physically swung at, and hit, two Philadelphia police officers.

4. On or about March 28, 2017:

a. At approximately 2:15 p.m., on the 3100 block of Weymouth Street, defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” and Co-Conspirator 2, an individual known to the grand jury, sold a confidential human source utilized by the Philadelphia Police Department (hereinafter CHS-2) one bundle containing 27 blue “trashcans” containing cocaine base (“crack”) in exchange for \$120. Prior to the sale, defendant RESTO-BERRIOS obtained the cocaine base (“crack”) from a red BMW vehicle that was parked on the street.

b. At approximately 2:30 p.m., defendant JAVIER RESTO-BERRIOS handed U.S. currency to Co-Conspirator 2 and Co-Conspirator 2 placed the money in the red BMW vehicle and drove to the 700 block of Alleghany Avenue. Defendant RESTO-BERRIOS was stopped by a police officer and found to have \$21 in drug proceeds on his person. Inside of the red BMW police officers located \$3,434 of drug proceeds from drug sales made by the Weymouth DTO.

5. On or about August 12, 2017:

a. At approximately 3:58 p.m., on the 3100 block of Weymouth Street, defendant ANGEL RIOS-VALENTIN received an unknown amount of U.S. currency from Buyer 1, a person known to the grand jury. Defendant RIOS-VALENTIN then entered the right passenger door of a blue Dodge Caravan that was parked on the 3100 block of Weymouth Street, returned to Buyer 1 and handed Buyer 1 28 amber-tinted flip top containers containing cocaine base (“crack”).

b. At approximately 4:30 p.m., defendant ANGEL RIOS-VALENTIN, in response to police attempting to arrest him, threw a set of vehicle keys that were later found to unlock the blue Dodge Caravan. Defendant RIOS-VALENTIN also possessed \$289 in drug proceeds.

c. Defendant ANGEL RIOS-VALENTIN possessed with intent to distribute, a black plastic bag with 364 amber-tinted flip top containers containing cocaine base (“crack”), 121 packets containing cocaine, and 280 packets stamped “Santa Muerte” containing heroin inside the blue Dodge Caravan.

6. On or about April 7, 2018:

a. From approximately 8:30 a.m. through approximately 9:15 a.m., on the 3100 block of Weymouth Street, Co-Conspirator 3 and Co-Conspirator 4, both individuals

known to the grand jury, made multiple sales of controlled substances to several buyers. The sales included packets of heroin/fentanyl stamped “Santa Muerte,” and packets of cocaine stamped “Eight Ball” and “Black Spade.”

b. Shortly thereafter that same morning, as PPD officers attempted to secure 3152 Weymouth Street, defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” attempted to flee the rear of 3152 Weymouth Street in an attempt to evade arrest.

c. At approximately 3:50 p.m., defendants RAMON ROMAN-MONTANEZ and NANCY RIOS-VALENTIN, possessed with the intent to distribute approximately 1,508 packets of heroin stamped “Santa Muerte,” weighing a total of approximately 59 grams; approximately 119 zip-lock packets of cocaine, stamped “Eight Ball,” weighing a total of approximately 26.9 grams; and approximately \$55,702 in drug proceeds, inside of 3152 Weymouth Street.

d. Also in the basement of 3152 Weymouth Street, defendants NANCY RIOS-VALENTIN and RAMON ROMAN-MONTANEZ illegally harbored fourteen caged roosters, and additional hens and chicks; and possessed a rooster fighting pen.

7. On December 15, 2018:

a. Throughout the day, defendant CARLA DIAZ-RESTO, a/k/a “Karla,” used the porch area of 3136 Weymouth Street as a location to stash controlled substances which she intended to distribute.

b. At approximately 10:15 a.m., on the 3100 block of Weymouth Street, defendant CARLA DIAZ-RESTO distributed to Buyer 2, a person known to the grand jury, approximately 14 packets of heroin/fentanyl, stamped “White Bear,” weighing a total of approximately 0.42 grams.

c. At around the same time and shortly thereafter, defendant CARLA DIAZ-RESTO handed controlled substances that she retrieved from the porch area of 3136 Weymouth Street to Co-Conspirator 5 and Co-Conspirator 6, both persons known to the grand jury, who in turn made hand-to-hand sales of those controlled substances on the block.

d. At approximately 10:25 a.m., on the 3100 block of Weymouth Street, defendant CARLA DIAZ-RESTO possessed \$961 in drug proceeds which she received from Co-Conspirator 5 after Co-Conspirator 5 made multiple sales of controlled substances.

e. On the porch of 3136 Weymouth Street, defendant CARLA DIAZ-RESTO, a/k/a “Karla,” and Co-Conspirators 5 and 6 possessed over 200 packets of heroin/fentanyl, each stamped “White Bear,” weighing a total of approximately 4.2 grams, and approximately 55 brown flip-top containers containing cocaine base (“crack”), weighing a total of approximately 3.065 grams, that they intended to distribute on behalf of the Weymouth DTO.

8. Between on or about January 17, 2019 and January 20, 2019, defendants CARLA DIAZ-RESTO, a/k/a “Karla,” SONIA RAMOS DE JESUS, and JUAN GOMEZ-RESTO, a/k/a “Pupo,” and Co-Conspirator 4, engaged in, facilitated, and aided and abetted numerous hand-to-hand drug transactions that occurred on the 3100 block of Weymouth Street, in which packets of suspected fentanyl/heroin were sold to various buyers, including those stamped “GAME OF THRONES.”

9. On or about January 23, 2019:

a. At approximately 1:55 p.m., inside 3152 Weymouth Street, defendants RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” and NANCY RIOS-VALENTIN possessed approximately \$7,190 in drug proceeds and multiple drug ledgers.

b. Inside 3134 Weymouth Street, members of the Weymouth DTO stashed drug paraphernalia, and a box of .45 caliber ammunition.

c. Inside 3133 Weymouth Street, members of the Weymouth DTO stashed approximately 14 packets of suspected heroin/fentanyl stamped "Game of Thrones."

d. Inside 3135 Weymouth Street, members of the Weymouth DTO stashed a scale, approximately 665 packets of suboxone strips, and \$25,804.

e. Inside 3125 Weymouth Street, members of the Weymouth DTO stashed a Taurus PT99 AF 9mm semi-automatic pistol, loaded with 16 live rounds of ammunition, a Smith & Wesson .38 Special revolver, bearing serial number #J75447, a Ruger LC9, 9mm semi-automatic pistol, bearing serial number 321-15519, loaded with 10 live rounds of ammunition, a box of .40 caliber ammunition, a box of .38 special ammunition, and two black magazines.

10. On or about May 2, 2019, defendant JUAN GOMEZ-RESTO, a/k/a "Pupo," possessed with the intent to distribute, on behalf of the Weymouth DTO, approximately 20 packets of suspected fentanyl/heroin, inside of 3137 Weymouth Street.

11. On or about August 27, 2019, defendant ANGEL RIOS-VALENTIN retrieved a black satchel from 3152 Weymouth Street containing a loaded firearm, namely a Polymer80 Inc., Model PFC940, .40 caliber S&W, attached to a Glock 23 Austria slide, bearing serial number HBE973, loaded with 14 live rounds of ammunition. Defendant RIOS-VALENTIN then proceeded to the area of 1200 East Venango Street, carrying the firearm in the satchel.

12. On or about March 11, 2020:

a. At approximately 11:49 p.m., defendant ELLIOT MATTEI-RODRIGUEZ and Co-Conspirator 7, a person known to the grand jury, drove down the 3100 block of Weymouth Street in a black Toyota and parked near Clearfield Street. Defendant ELLIOT

MATTEI-RODRIGUEZ exited the passenger side and Co-Conspirator 7 exited the driver side. Both defendant MATTEI-RODRIGUEZ and Co-Conspirator 7 entered 3152 Weymouth Street, a known stash location for the Weymouth DTO.

b. At approximately 11:55 p.m., defendant ELLIOT MATTEI-RODRIGUEZ and Co-Conspirator 7 exited 3152 Weymouth Street, reentered the black Toyota, and departed the area. The Toyota stopped in front of 3311 Palethorp Street. Defendant MATTEI-RODRIGUEZ entered and then later exited 3311 Palethorp Street and handed a white bag to Co-Conspirator 7, still driving the Toyota, who then drove away.

c. Inside the white bag found inside the Toyota, defendant ELLIOT MATTEI-RODRIGUEZ and Co-Conspirator 7 possessed with the intent to distribute three clear baggies of cocaine powder, and a square brick shaped object wrapped in a tan plastic bag with electrical tape around it containing cocaine, with a total weight of approximately 864 grams of cocaine.

d. Inside 3311 Palethorp Street, defendant ELLIOT MATTEI-RODRIGUEZ possessed a Glock 23, Austria .40 caliber semi-automatic pistol, bearing serial number 6YB992, loaded with an extended magazine containing 28 rounds live rounds of ammunition, and a Glock 17, Austria 9x19 semi-automatic pistol, bearing serial number XW200, loaded with an extended magazine containing 22 live rounds of ammunition.

13. On or about August 2, 2020, at approximately 4:03 p.m., on the 3100 block of Weymouth Street, defendant ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” approached a silver Honda. Co-Conspirator 8, a person known to the grand jury, who had been driving a silver Honda, opened the trunk of the Honda. Defendant GONZALEZ-CLAUDIO then removed two black bags shaped as firearms from the trunk, each containing rifles sticking out.

Defendant GONZALEZ-CLAUDIO pulled out a firearm from one of the bags and showed it to other males who were standing with him on the street. Defendant GONZALEZ-CLAUDIO then placed a firearm with an extended magazine into a 1992 Toyota, which was also on the block.

14. On or about March 2, 2021:

a. From approximately 7:30 a.m. to 9:15 a.m., on the 3100 block of Weymouth Street, Co-Conspirator 9, an individual known to the grand jury, made multiple hand-to-hand transactions with unknown individuals on the block who then departed and walked out of view. Co-Conspirator 9 repeatedly went into a black Acura, often in between these hand-to-hand transactions. Defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” was also in and out of this same black Acura, including sitting inside the driver’s seat.

b. Inside this black Acura, defendant ELLIOT MATTEI-RODRIGUEZ and Co-Conspirator 9 possessed with the intent to distribute 1,048 packets of heroin/fentanyl, each stamped “RIC FLAIR,” weighing a total of approximately 34.3 grams, and possessed \$1,090 in drug proceeds.

15. On or about July 28, 2022:

a. At approximately 12:45 p.m., on the 3100 block of Weymouth Street, defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” distributed to Buyer 3, a person known to the grand jury, approximately seven packets of heroin/fentanyl stamped “HORSE POWER,” weighing a total of approximately 0.06 grams.

b. At approximately 12:55 p.m., on the 3100 block of Weymouth Street, defendant KELVIN AGUAYO-GARCIA distributed to Buyer 4, a person known to the grand jury, approximately four packets of heroin/fentanyl, each stamped “HORSE POWER,” weighing a total of approximately 0.10 grams. Defendant RICHARD CARTAGENA, a/k/a “Richie,” distributed to

Buyer 4 one packet of cocaine. Defendant AGUAYO-GARCIA possessed \$68 of drug proceeds and defendant CARTAGENA possessed \$150 of drug proceeds.

16. Between on or about August 4, 2022, and on or about October 11, 2022, defendants KELVIN AGUAYO-GARCIA, a/k/a “Negro” and ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” each worked numerous caseworker and/or street hustler shifts on the 3100 block of Weymouth Street, during which they would accept drug proceeds from street dealers for the Weymouth DTO after those persons conducted drug sales on the block, provide additional quantities of controlled substances to street dealers that were stashed in properties on the 3100 block of Weymouth, and make hand-to-hand drug sales themselves.

17. On or about October 18, 2022:

a. At approximately 6:38 p.m., on the 3100 block of Weymouth Street, defendant JONATHAN TORRES tried to flee law enforcement by placing his vehicle in reverse and driving away. Defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” and Co-Conspirator 10, a person known to the grand jury, and previously a member of the Weymouth DTO (now deceased), were passengers in this vehicle.

b. Defendant JONATHAN TORRES eventually exited the vehicle, resisted arrest, and began wrestling with the officers. At one point during the struggle, defendant TORRES drew a Glock 30, .45 caliber semi-automatic pistol, loaded with 24 live rounds of ammunition, with an obliterated serial number, from his waistband and pointed it at a police officer.

18. On or about October 20, 2022:

a. At 3152 Weymouth Street, inside of this residence and on the porch of this residence, defendants RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” and NANCY RIOS-

VALENTIN possessed with the intent to distribute approximately 57 blue pills marked “M 30,” which contained a mixture and substance with a detectable amount of fentanyl, weighing a total of approximately 8.167 grams, and approximately 2,800 packets of fentanyl/heroin, each stamped “Debo,” weighing a total of approximately 96 grams. Defendants ROMAN-MONTANEZ and RIOS-VALENTIN also possessed, inside of this residence and on the porch of the residence, approximately \$124,200 in drug proceeds, drug ledgers, and four firearms including: a black Glock 22, .40 caliber semi-automatic pistol, bearing serial number HUL589, with three loaded magazines containing 45 live rounds of ammunition; a black Glock 23, .40 caliber semi-automatic pistol, bearing serial number BSRF744; a black Ruger EC9, 9mm semi-automatic pistol, with one magazine containing seven rounds of live ammunition; and a silver black handle Taurus Armas, .38 caliber revolver, bearing serial number AAL061522, loaded with eight live rounds of ammunition.

b. At 3126 Weymouth Street, defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” possessed, along with other members of the Weymouth DTO, a black and brown Draco AK 47, 7.62 caliber semi-automatic rifle, bearing serial number DR-8286-10, loaded with 31 live rounds of ammunition, found on a ledge of a second floor window; a black and green AR-15, aero model X15, semi-automatic pistol, bearing serial number X257462, with a double-drum magazine that was loaded with 80 live rounds of ammunition, found on the roof of the row-home; and 140 orange flip-top containers containing cocaine base (“crack”), found hanging on the rear fence.

c. At 3718 N. 9th Street, in the rear yard under an air conditioner, defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” possessed a loaded handgun with an obliterated serial number.

19. On or about November 1, 2023:

a. Co-Conspirator 11, a person known to the grand jury, uploaded a music video to YouTube entitled “Patroncito,” in which multiple members of the Weymouth DTO are seen.

b. During the music video, masked unidentified co-conspirators brandished firearms, and the entire video is filmed on the 3100 block of Weymouth.

c. In order to promote the reputation of the Weymouth DTO and threaten acts of violence against the DTO’s enemies, Co-Conspirator 11 rapped lyrics that included, “I’ll get you with Panza with Draco and you’re stiff,” referring to a threatened act of violence that Co-Conspirator 11 would commit with Co-Conspirator 12 (now deceased, and whose alias was “Panza”) involving a Draco firearm. A screenshot from the music video is below:



20. On or about January 25, 2024:

a. At approximately 3:28 p.m., at or around the 3100 block of Weymouth Street, defendant ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” accepted money from a person, unknown to the grand jury.

b. At approximately 3:31 p.m., defendant ANGELMILL GONZALEZ-CLAUDIO went to 3129 Weymouth Street, a property controlled by the Weymouth DTO, and extended his arm through the window to an unknown person.

c. Shortly thereafter, defendant ANGELMILL GONZALEZ-CLAUDIO distributed to a confidential human source utilized by the Federal Bureau of Investigation (“FBI”) (hereinafter “CHS-3”) seven bundles containing a total of 97 packets of fentanyl/heroin, each stamped “RIC FLAIR,” weighing a total of approximately 4.2 grams, in exchange for \$460. Defendant GONZALEZ-CLAUDIO engaged in the hand-to-hand transaction with CHS-3 in the area of 3126 Weymouth Street.

21. On or about April 16, 2024, between approximately 6:17 a.m. and 7:00 a.m., defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan,” engaged in hand-to-hand transactions of controlled substances on behalf of the Weymouth DTO on the 3100 block of Weymouth Street and jointly possessed for the purposes of distribution along with other members of the DTO, inside of 3110 Weymouth Street, approximately 1,036 orange flip-top containers of cocaine base (“crack”), weighing approximately 90.7 grams, and 149 blue packets of cocaine base (“crack”), weighing approximately 37.2 grams.

22. On or about April 19, 2024:

a. Co-Conspirator 13, a person known to the grand jury, uploaded a music video to YouTube entitled “Philly Boy,” in which multiple members of the Weymouth DTO are seen and in which most of the music video was filmed on the 3100 block of Weymouth Street. During the music video, Co-Conspirator 12 and other masked unidentified co-conspirators brandished firearms, and defendants ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” LUIS WILLIAMS, JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” JOHN DAVID

LOPEZ-BORIA, a/k/a “Grande,” and Co-Conspirator 14, a person known to the grand jury, appear in the video at various points next to individuals wielding firearms, making gestures of violence or gang affiliation, and walking through streets that neighbor the 3100 block of Weymouth Street.

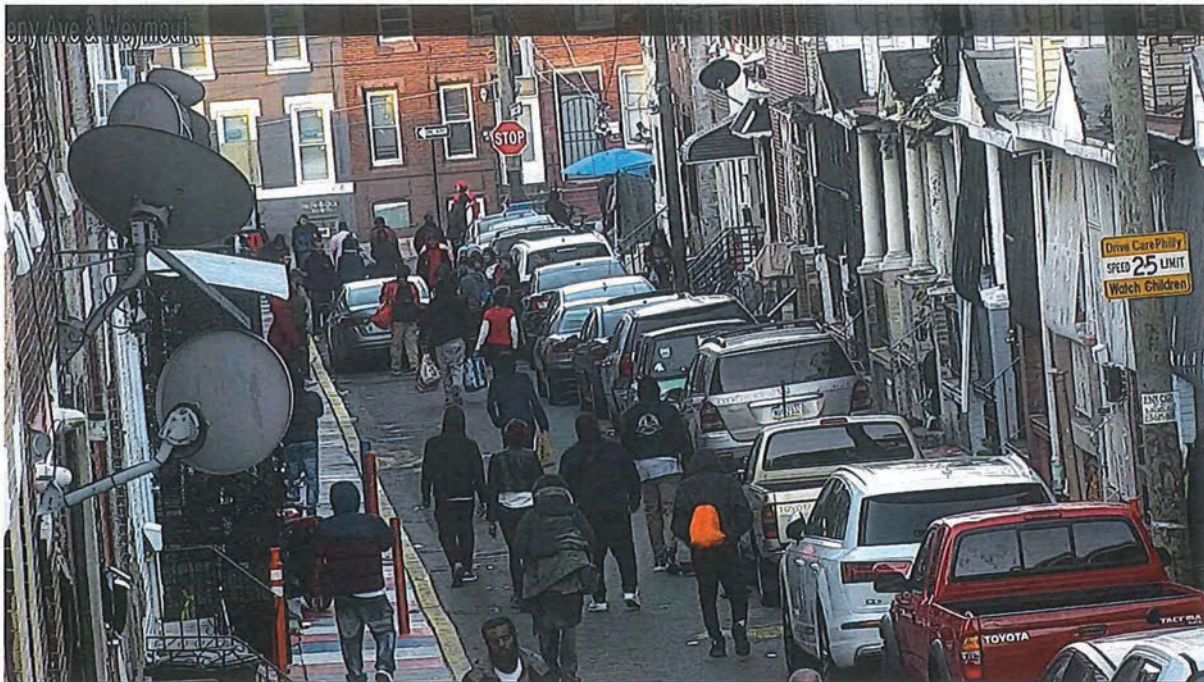
b. In order to further the drug-selling mission of the Weymouth DTO and to threaten rival drug trafficking groups or street gangs with violence, Co-Conspirator 13 rapped lyrics that include “I change rhythms with the *switch*, *VVS* shine because of me, my devils kill for me,” and “I have a devil on my shoulder and a Baby Yoda in my mind... He tells me to kill you, to burn you, fuck it,” referring to threatened acts of violence that would be taken on behalf of the Weymouth DTO. A screenshot from the video is below:



23. On or about April 30, 2024:

a. At approximately 5:20 a.m., defendants KELVIN AGUAYO-GARCIA, a/k/a “Negro,” RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” ANGEL RIOS-VALENTIN, Co-Conspirator 1, and Co-Conspirator 12 watched the installation of a FBI pole camera through binoculars and appear to speak with each other about the installation.

b. Shortly thereafter defendants KELVIN AGUAYO-GARCIA, RAMON ROMAN-MONTANEZ, ANGEL RIOS-VALENTIN, Co-Conspirator 1, and Co-Conspirator 12 distributed samples of narcotics to drug customers in anticipation of the first of the month. A screenshot of the distribution is below:



24. On or about May 6, 2024, at approximately 10:18 p.m., on the 3100 block of Weymouth Street, defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” and Co-Conspirator 12 dragged an unknown person across the ground in the direction of the “bunker” at 3153 Weymouth Street. Shortly thereafter, Co-Conspirator 12 struck the unknown person with a rod.

25. On or about May 17, 2024:

a. At approximately 5:50 a.m., on the 3100 block of Weymouth Street, defendant LUIS WILLIAMS distributed to Buyer 5, a person known to the grand jury, approximately 70 packets of fentanyl/heroin, each stamped “HORSE POWER,” weighing approximately 2.7 grams. During the course of the transaction, defendant WILLIAMS entered an

abandoned property located at 3126 Weymouth Street for approximately 30 seconds and then exited, after which he handed the narcotics to Buyer 5.

b. At approximately 6:40 a.m., defendant LUIS WILLIAMS distributed to Buyer 6, a person known to the grand jury, approximately 14 packets of fentanyl/heroin, each stamped “HORSE POWER,” weighing approximately 0.46 grams. During the course of the transaction, defendant WILLIAMS entered an abandoned property at 3126 Weymouth Street for approximately 30 seconds and then exited, after which he handed the narcotics to Buyer 6.

c. At approximately 6:55 a.m., on the 3100 block of Weymouth Street, defendant LUIS WILLIAMS possessed \$1,952 in drug proceeds.

d. At approximately 7:00 a.m., inside 3126 Weymouth Street, defendant LUIS WILLIAMS possessed with the intent to distribute, and stashed on behalf of the Weymouth DTO, approximately 330 packets of cocaine, weighing approximately 80.1 grams, approximately 1,409 packets of heroin/fentanyl, each stamped “HORSE POWER,” weighing approximately 54.4 grams, and additional quantities of cocaine base (“crack”) and packets of heroin/fentanyl.

26. On or about May 18, 2024, Co-Conspirator 11 uploaded a music video to YouTube entitled “23,” featuring defendant JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” in which defendant LOPEZ-BORIA brandished a firearm and Co-Conspirator 11 held stacks of drug proceeds in the “bunker,” located at 3153 Weymouth Street and used by the Weymouth DTO as a location to store drugs, drug proceeds, and firearms, and to discuss matters pertaining to drug trafficking. In the video, defendant LOPEZ-BORIA threatened rival drug trafficking groups and those who cooperate with law enforcement by rapping the lyrics, “You die today or you die today, I will make sure of it, they told me the facts, you’re talking to DEA.” A screenshot from the video is below:



27. On or about October 29, 2024:

a. At approximately 3:59 p.m., on the 3100 block of Weymouth Street, a confidential human source utilized by the FBI (hereinafter “CHS-4”) spoke with defendants JONATHAN TORRES and EDERICK RIVERA SANTIAGO-GONZALEZ, a/k/a “Negro,” a/k/a “Edri,” regarding his interest in acquiring “some bundles” of fentanyl/heroin, and defendants TORRES and SANTIAGO-GONZALEZ quoted CHS-4 a price of \$60 a bundle for six bundles.

b. Shortly thereafter, defendant JONATHAN TORRES entered 3117 Weymouth Street, a location controlled by the Weymouth DTO and used as a stash location.

c. Approximately a minute later, defendant JONATHAN TORRES exited 3117 Weymouth Street.

d. Immediately upon exiting 3117 Weymouth Street, defendant JONATHAN TORRES distributed to CHS-4 six bundles containing a total of 82 packets of fentanyl/heroin, each stamped “SHAMA,” weighing a total of approximately 3.29 grams, in

exchange for \$350. Defendant TORRES engaged in the hand-to-hand transaction with CHS-4 outside of 3118 Weymouth Street.

25. On or about November 7, 2024, at approximately 10:45 p.m., defendants JOSUE ONEIL ORTIZ-BETANCOURT and JONATHAN TORRES, Co-Conspirator 12, and another unidentified person with a long gun, chased after—on foot—a car that had sped down the 3100 block of Weymouth Street minutes earlier and was around the corner. Defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” pulled out a firearm, chambered a round, and stood guard on the end of the 3100 block of Weymouth, asserting the Weymouth DTO’s position of authority and control over the block. Once defendants ORTIZ-BETANCOURT and TORRES, and Co-Conspirator 12 and the other unidentified person with the long gun, caught up with the vehicle—at or near 719 East Clearfield Street—one or more of them shot at the car, releasing multiple rounds, after which defendants ORTIZ-BETANCOURT and TORRES, Co-Conspirator 12 and the other unidentified person with the long gun, all ran back to 3100 Weymouth block to take refuge.

26. On or about November 15, 2024:

a. At approximately 4:34 p.m., on the 3100 block of Weymouth Street, defendant JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” spoke with CHS-4 about a narcotics transaction.

b. At approximately 4:35 p.m., defendant JOHN DAVID LOPEZ-BORIA reached into a trash can near 3131 Weymouth Street and then distributed to CHS-4 six bundles containing a total of 81 packets of fentanyl/heroin, each stamped “SHAMA,” weighing a total of approximately 3.59 grams, in exchange for \$360.

27. On or about November 20, 2024:

a. At approximately 7:05 a.m., on the 3100 block of Weymouth Street, defendant JONATHAN TORRES possessed with intent to distribute approximately 126 packets of heroin/fentanyl stamped “SHAMA,” with a weight of approximately 4.60 grams, that TORRES stashed near a trash can in front of 3129 Weymouth Street.

b. At approximately 7:20 a.m., on the 3100 block of Weymouth Street, defendant JONATHAN TORRES possessed \$14 in drug proceeds.

28. On or about December 2, 2024:

a. At approximately 1:25 p.m., on the 3100 block of Weymouth Street, defendant ADELEDA GONZALEZ, a/k/a “Moya,” took an order for narcotics from a confidential human source utilized by the FBI (hereinafter “CHS-5”).

b. Shortly thereafter, defendant ADELEDA GONZALEZ signaled for defendant JONATHAN TORRES to come to where defendant GONZALEZ was standing with CHS-5. Defendant TORRES exited the doorway of 3126 Weymouth Street and entered 3131 Weymouth Street, a location used by the Weymouth DTO to store drugs and consummate drug transactions. Defendant TORRES exited 3131 Weymouth Street after about one minute, walked up to meet with defendant GONZALEZ, and defendants TORRES and GONZALEZ then continued down the block to meet up with CHS-5.

c. At approximately 1:28 p.m., defendant JONATHAN TORRES distributed to CHS-5 ten bundles containing a total of 140 packets of fentanyl/heroin, each stamped “SHAMA,” weighing a total of approximately 5.19 grams, in exchange for \$650. Defendant TORRES told CHS-5 that the price was \$65 a bundle, not \$60, and the remaining \$5 were defendant TORRES’ money.

d. At approximately 3:46 p.m., defendant RICHARD CARTAGENA, a/k/a “Richie,” arrived on the 3100 block of Weymouth Street and provided defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” who was standing with defendant SONIA RAMOS DE JESUS, a supply of controlled substances for sale on the block.

e. At approximately 4:24 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” exited his residence at 3140 Weymouth Street and distributed to CHS-4 ten bundles containing a total of 154 total packets of fentanyl/heroin, each stamped “SHAMA,” in exchange for \$650. Defendant RESTO-BERRIOS engaged in the hand-to-hand transaction with CHS-4 in the lot at 3114 Weymouth Street.

29. On or about December 19, 2024:

a. At approximately 2:16 p.m., defendant RICHARD CARTAGENA, a/k/a “Richie,” arrived on the 3100 block of Weymouth Street on a motorized bike and then entered 3131 Weymouth Street, a location used by the DTO to store drugs and consummate drug transactions, so that he could deliver a supply of controlled substances to be resold by the Weymouth DTO.

b. At approximately 3:27 p.m. defendants JAVIER RESTO-BERRIOS, a/k/a/ “Chicken,” and JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” met with CHS-4 on the 3100 block of Weymouth Street and took an order from CHS-4 of several bundles of fentanyl/heroin and discussed the price.

c. Defendant JOSE SANTANA-GONZALEZ entered 3131 Weymouth Street, a location used by the DTO to store drugs and consummate drug sales and exited the same property about one minute later. Defendant SANTANA-GONZALEZ walked back to CHS-4 and

defendant JAVIER RESTO-BERRIOS, and together they all moved between two parked cars, in the vicinity of 3140 Weymouth Street.

d. At approximately 3:30 p.m., defendant JOSE SANTANA-GONZALEZ distributed to CHS-4 five bundles containing a total of 70 packets of fentanyl/heroin, each stamped "SHAMA," weighing a total of approximately 2.46 grams, in exchange for \$330. Defendant JAVIER RESTO-BERRIOS received the buy money from CHS-4 and returned to CHS-4 some change. Defendants SANTANA-GONZALEZ and RESTO-BERRIOS were standing on the 3100 block of Weymouth Street with CHS-4 when they engaged in this hand-to-hand transaction with CHS-4.

e. After this transaction, defendant JAVIER RESTO-BERRIOS entered 3140 Weymouth Street.

30. On or about January 3, 2025:

a. At approximately 1:44 p.m., defendant JOSUE ONEIL ORTIZ-BETANCOURT departed from 3117 Weymouth Street, a stash location for the Weymouth DTO, and then crossed the block. Defendant ORTIZ-BETANCOURT then placed narcotics under a trash can located in front of 3134 Weymouth Street.

b. At approximately 1:55 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a "Chicken," exited 3140 Weymouth Street and walked to near 3131 Weymouth Street to stand with defendant JOSE SANTANA-GONZALEZ, a/k/a "Chipi," a/k/a "Chepo."

c. At approximately 1:58 p.m., defendant RICHARD CARTAGENA, a/k/a "Richie," drove a motorized bike up the 3100 block of Weymouth Street from Clearfield Street. As he neared 3131 Weymouth Street, defendant CARTAGENA reached into his jacket and

pulled out a white package containing controlled substances and tossed it to defendant JAVIER RESTO-BERRIOS as he drove by. Defendant CARTAGENA then drove off the block.

d. At approximately 2:00 p.m., Co-Conspirator 15, an individual unknown to the grand jury, retrieved four bundles of fentanyl/heroin from under the trash can where defendant JOSUE ONEIL ORTIZ-BETANCOURT had placed narcotics approximately fifteen minutes earlier and handed the bundles to CHS-5. At approximately 2:02 p.m., defendant SONIA RAMOS DE JESUS handed CHS-5 a fifth bundle of fentanyl/heroin, quoting a price of \$65. Altogether, Co-Conspirator 15 and defendant RAMOS DE JESUS distributed to CHS-5 five bundles containing a total of 70 packets of fentanyl/heroin, each stamped “SHAMA,” weighing a total of approximately 2.55 grams, in exchange for \$315.

e. Directly after the transaction, Co-Conspirator 15 provided the proceeds of the sale to defendant JULIO JOSE RAMIREZ-DIAZ, a/k/a “June,” and defendants RAMIREZ-DIAZ and JOSUE ONEIL ORTIZ-BETANCOURT entered 3131 Weymouth Street, a location used by the Weymouth DTO to store drugs and consummate drug sales.

31. On or about January 7, 2025:

a. At approximately 2:21 p.m., defendants RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” and RICHARD CARTAGENA, a/k/a “Richie,” arrived on the 3100 block of Weymouth Street in a red pick-up truck. Defendant CARTAGENA then got on a motorized bike parked in front of 3152 Weymouth Street, departed the block, and drove to his residence. At 2:29 p.m., defendant CARTAGENA returned on his motorized bike to the 3100 block of Weymouth Street and entered 3131 Weymouth Street, to deliver a supply of controlled substances to be used by the Weymouth DTO. Approximately thirty seconds later, defendant

CARTAGENA exited 3131 Weymouth Street, got back on the motorized bike, and departed the block.

b. At approximately 3:12 p.m., defendant JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” stood in the doorway of 3131 Weymouth Street, a location used by the DTO to store narcotics and consummate drug sales, and received an order of five bundles of fentanyl/heroin from CHS-4.

c. At approximately 3:13 p.m., defendant JOSE SANTANA-GONZALEZ brought CHS-4 inside 3131 Weymouth Street, to complete the narcotics order.

d. Shortly thereafter, inside 3131 Weymouth Street, defendant JOSE SANTANA-GONZALEZ distributed to CHS-4 ten pink-tinted flip top containers of cocaine base (“crack”), weighing a total of approximately 0.68 grams, and then directed CHS-4 to defendant JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” for the fentanyl. Defendant LOPEZ-BORIA distributed to CHS-4 five bundles containing a total of 70 packets of fentanyl/heroin, each stamped “SHAMA,” weighing a total of approximately 2.4 grams. CHS-4 handed defendant SANTANA-GONZALEZ a total of \$400 for the fentanyl and cocaine base (“crack”).

32. On or about January 14, 2025:

a. At approximately 2:29 p.m., defendant RICHARD CARTAGENA, a/k/a “Richie,” arrived on the 3100 block of Weymouth Street on a motorized bike, parked the bike between two parked cars, and entered 3131 Weymouth Street, a location used by the Weymouth DTO to store drugs and consummate drug sales, to deliver a supply of controlled substances to be used by the Weymouth DTO for sales. Approximately 30 seconds later, defendant CARTEGENA exited 3131 Weymouth Street, got on his bike, and departed the block.

b. At approximately 3:00 p.m., defendant JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” took a narcotics order from CHS-4 for “30 bundles” of fentanyl/heroin and “10 hard ones” (i.e., vials of cocaine base (“crack”)), from inside of 3131 Weymouth Street, where defendant RICHARD CARTAGENA had recently visited. Defendants SANTANA-GONZALEZ and JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” spoke with CHS-4 about his narcotics order and negotiated the price with CHS-4.

c. Shortly thereafter, defendant JOHN DAVID LOPEZ-BORIA exited 3131 Weymouth Street and entered 3117 Weymouth Street, another location used by the DTO to store drugs.

d. At approximately 3:05 p.m., defendant JOHN DAVID LOPEZ-BORIA reentered 3131 Weymouth Street and met back up with CHS-4, defendant JOSE SANTANA-GONZALEZ, and Co-Conspirator 16, a person known to the grand jury. CHS-4 was directed to retrieve 30 bundles, containing a total of 420 packets of fentanyl/heroin, each marked “SHAMA,” weighing a total of approximately 12.0 grams, which had been placed on the floor. Co-Conspirator 16 handed CHS-4 ten vials of cocaine base (“crack”), weighing a total of approximately 0.9 grams. CHS-4 handed \$1,850 to Co-Conspirator 16 in exchange for the narcotics.

33. On or about January 16, 2025, Co-Conspirator 17, a person known to the grand jury, uploaded a music video to YouTube entitled “KAIOKEN,” in which multiple members of the Weymouth DTO are seen. During the music video, Co-Conspirator 17 is seen brandishing a handgun with an extended magazine on a stoop outside the “bunker” at 3153 Weymouth Street. Defendant JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” is pictured at various points in the

music video. The lyrics rapped by Co-Conspirator 17 include “I don’t talk, I get in and will come to hunt you, asshole.” A screenshot of Co-Conspirator 17 from the video is below:



34. On or about February 5, 2025:

a. Members of the DTO stored seven bundles, containing a total of 72 packets of fentanyl, each stamped “Rolex,” weighing a total of approximately 1.64 grams, 30 packets of cocaine, weighing a total of approximately 8.97 grams, and two flip-top containers of cocaine base (“crack”), weighing a total of approximately 0.162 grams, inside of 3131 Weymouth Street, a location used by the DTO to store narcotics and consummate drug sales.

b. At approximately 12:50 p.m., defendant JULIO JOSE RAMIREZ-DIAZ, a/k/a “June,” possessed with the intent to distribute 15 bundles containing a total of 210 packets of fentanyl/heroin, each stamped “SHAMA,” weighing a total of approximately 4.54 grams, and 56 flip top containers of cocaine base (“crack”), weighing a total of approximately 4.0 grams, in the vicinity of 3117 Weymouth Street, a location used by the DTO to store narcotics.

c. At approximately 2:55 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” received an order from CHS-5 for one bundle of fentanyl/heroin, while defendant RESTO-BERRIOS was standing with CHS-5 on the 3100 block of Weymouth Street. An individual, unknown to the grand jury, handed RESTO-BERRIOS an item from the doorway of 3126 Weymouth Street. Defendant RESTO-BERRIOS then distributed to CHS-5 one bundle, containing a total of 14 packets of fentanyl/heroin, each stamped “SHAMA,” in exchange for \$65.

35. On or about February 18, 2025:

a. At approximately 11:47 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” entered his residence at 3140 Weymouth Street.

b. At approximately 11:57 a.m., inside of 3131 Weymouth Street, a location used by the DTO to consummate drug transactions, defendant JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” took a narcotics order from CHS-4 for “30 bundles” of fentanyl.

c. Shortly thereafter, defendant JOSE SANTANA-GONZALEZ exited 3131 Weymouth Street and stood outside 3140 Weymouth Street, the residence of defendant JAVIER RESTO-BERRIOS.

d. Defendant JOSE SANTANA-GONZALEZ then obtained narcotics from a person unknown to the grand jury from 3140 Weymouth Street, where defendant JAVIER RESTO-BERRIOS had recently entered.

e. Shortly thereafter, defendant JOSE SANTANA-GONZALEZ returned to 3131 Weymouth Street and from inside that location, distributed to CHS-4 thirty bundles, containing a total of 420 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 11.25 grams, in exchange for \$1,800.

36. On or about February 24, 2025:

a. At approximately 1:14 p.m., CHS-4 placed a telephone call to defendant JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” to say that he was on the way to the block to consummate a drug transaction, which CHS-4 and defendant SANTANA-GONZALEZ had discussed generally by phone and text message conversation the day prior.

b. At approximately 1:29 p.m., inside 3131 Weymouth Street, a location controlled by the Weymouth DTO and used by the DTO to store narcotics and consummate drug transactions, defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” took an order from CHS-4 for “thirty” bundles of fentanyl.

c. Shortly thereafter, defendant RICHARD CARTAGENA, a/k/a “Richie,” arrived at 3131 Weymouth Street and handed a bag containing a resupply of narcotics to defendant JAVIER RESTO-BERRIOS. Defendant RESTO-BERRIOS handed items to Co-Conspirator 18, a person known to the grand jury, who was also inside of 3131 Weymouth Street and helping to coordinate the transaction. Co-Conspirator 18 distributed to CHS-4 thirty bundles containing a total of 420 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 10.6 grams, in exchange for \$1,800.

37. On or about March 4, 2025, defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” spoke with a confidential human source utilized by the FBI (hereinafter “CHS-6”). Defendant MATTEI-RODRIGUEZ and CHS-6 discussed the price for bundles of the “slow one,” and “cocaine.” Defendant MATTEI-RODRIGUEZ told CHS-6 that he had been shot near Clearfield and Potter Streets. Defendant MATTEI-RODRIGUEZ also mentioned that his workers were not making any sales when he showed up the other day, so he dismissed them as punishment.

CHS-6 asked defendant MATTEI-RODRIGUEZ what defendant MATTEI-RODRIGUEZ called the “slow one.” Defendant MATTEI-RODRIGUEZ said it was called “OCHO BLANCO.”

38. On or about March 5, 2025:

a. At approximately 12:07 p.m., on the 3100 block of Weymouth Street, defendant JOSUE ONEIL ORTIZ-BETANCOURT took a narcotics order from CHS-5.

b. Shortly thereafter defendant JOSUE ONEIL ORTIZ-BETANCOURT distributed to CHS-5 four bundles containing a total of 56 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 1.53 grams in exchange for \$260. Defendant ORTIZ-BETANCOURT engaged in the hand-to-hand transaction with CHS-5 in the vicinity of 3134 Weymouth Street.

c. At approximately 6:38 p.m., defendants JOSE JAVIER SANTANA-GONAZLEZ, a/k/a “Chipi,” a/k/a “Chepo,” RICHARD CARTAGENA, a/k/a “Richie,” and RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” along with Co-Conspirator 12, entered the “bunker” at 3153 Weymouth Street.

d. While inside the “bunker,” defendant ROMAN-MONTANEZ handed Co-Conspirator 12 narcotics. Co-Conspirator 12 then provided those narcotics to CHS-6, which consisted of twenty-one bundles containing a total of 280 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 7.76 grams, in exchange for \$1,100.

39. On or about March 9, 2025:

a. At approximately 10:25 p.m., defendant JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” entered 3131 Weymouth Street, a location used by the DTO to stash narcotics and consummate drug transactions.

b. As defendant JOSE SANTANA-GONZALEZ and CHS-4 entered 3131 Weymouth Street, a vehicle drove up the wrong way on 3100 Weymouth Street, which is a one-way street. Defendant SANTANA-GONZALEZ took CHS-4 to exit through the rear of 3131 Weymouth Street and enter the rear of 3135 Weymouth Street, another location used and controlled by the Weymouth DTO, through the back alley, to evade potential detection by law enforcement.

c. Once inside 3135 Weymouth Street, defendant JOSE SANTANA-GONZALEZ distributed to CHS-4 thirty bundles, containing a total of 419 packets of fentanyl/heroin, each stamped "RIFLAY," weighing a total of approximately 11.5 grams, in exchange for \$1,800.

40. On or about March 10, 2025:

a. At approximately 12:55 p.m., defendant ADELEDA GONZALEZ, a/k/a "Moya," took a narcotics order from CHS-5 for "bundles."

b. Shortly thereafter, defendant ADELEDA GONZALEZ walked to a vacant lot located at 3114 Weymouth Street, a stash location used and controlled by the Weymouth DTO.

c. At approximately 12:56 p.m., defendant ADELEDA GONZALEZ distributed to CHS-5 four bundles containing a total of 56 packets of fentanyl/heroin, each stamped "RIFLAY," weighing a total of approximately 1.48 grams, on the 3100 block of Weymouth Street.

41. On or about March 12, 2025:

a. At approximately 6:34 p.m., on the 3100 block of Weymouth Street, defendant HECTOR VEGA-MELENDEZ, a/k/a "Tito," met Buyer 7, a person known to the grand jury, in a vacant lot and sold him eight packets of fentanyl/heroin, each stamped "RIFLAY,"

weighing a total of approximately 0.18 grams, and five flip-top containers containing cocaine base (“crack”), weighing a total of approximately 0.64 grams.

b. At approximately 6:46 p.m., on the 3100 block of Weymouth Street, defendant HECTOR VEGA-MELENDEZ possessed \$325 in drug proceeds.

c. Shortly thereafter, law enforcement retrieved the following from 3115 Weymouth Street, where defendant HECTOR VELEZ-MELENDEZ was observed entering and exiting multiple times: 755 orange flip top containers containing cocaine base (“crack”), weighing a total of approximately 66.8 grams, 139 blue flip top containers containing cocaine base (“crack”), weighing a total of approximately 11.8 grams, 397 packets of fentanyl, each stamped “GRINCH,” weighing a total of approximately 12.2 grams, 30 black flip top containers containing powder cocaine, and 89 black plastic zip lock containers containing cocaine, weighing a total of approximately 24.9 grams.

42. On or about March 16, 2025:

a. At approximately 3:15 p.m., defendants JOHN DAVID LOPEZ-BORIA a/k/a “Grande” and LUIS WILLIAMS, and Co-Conspirator 17, were congregating at the intersection of Weymouth Street and Clearfield Street, and began to laugh at Victim 5, a person unknown to the grand jury, who was sitting on a front stoop across the block.

b. At approximately 3:19 p.m., defendants JOHN DAVID LOPEZ-BORIA and LUIS WILLIAMS, and Co-Conspirator 17, assaulted Victim 5 by physically striking Victim 5 and dragging Victim 5 into an abandoned lot on the 3100 block of Weymouth Street, where defendants LOPEZ-BORIA and WILLIAMS, and Co-Conspirator 17, continued the assault.

43. On or about March 20, 2025:

a. At approximately 4:52 p.m., CHS-6 placed a phone call to Co-Conspirator 12, but the call went to voicemail. At approximately 5:34 p.m. defendants RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” and JAVIER RESTO-BERRIOS, a/k/a “Chicken,” along with Co-Conspirator 12, spoke with CHS-6 outside of the “bunker,” located at 3153 Weymouth Street. Co-Conspirator 12 told CHS-6 he had tried to return his call. CHS-6 then placed an order of “18” bundles with Co-Conspirator 12, and Co-Conspirator 12 then told defendant ROMAN-MONTANEZ, who Co-Conspirator 12 referred to as “Viejo,” to provide the bundles. Defendant ROMAN-MONTANEZ directed defendant RESTO-BERRIOS to bring the narcotics.

b. Shortly thereafter, defendants JAVIER RESTO-BERRIOS and RAMON ROMAN-MONTANEZ entered the “bunker” structure located at 3153 Weymouth Street with CHS-6. Inside the “bunker,” defendant RESTO-BERRIOS distributed to CHS-6 eighteen bundles containing a total of 252 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 7.75 grams, in exchange for \$990. Defendant ROMAN-MONTANEZ accepted the money for these narcotics from CHS-6.

44. On or about March 29, 2025:

a. At approximately 6:30 p.m., defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” took an order from CHS-6 for “fifteen” bundles of fentanyl/heroin, as they were standing on the block outside of 3140 Weymouth Street. Defendant ROMAN-MONTANEZ told defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” to handle the order.

b. Shortly thereafter, defendant JAVIER RESTO-BERRIOS distributed to CHS-6 fifteen bundles containing a total of 210 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 5.89 grams, in exchange for \$825. Defendant RESTO-BERRIOS engaged in the hand-to-hand transaction with CHS-6 on the 3100 block of

Weymouth Street, in the area of 3153 Weymouth Street, where several members of the DTO were socially congregating at the time.

c. At approximately 6:31 p.m., defendants EDERICK RIVERA SANTIAGO-GONZALEZ, a/k/a “Negro,” a/k/a “Edri,” and ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” met inside the “bunker” at 3153 Weymouth Street and discussed quantities and prices of controlled substances.

45. On or about March 30, 2025, at approximately 6:00 p.m., defendant JOSE SANTANA-GONZALEZ, a/k/a “Chipi,” a/k/a “Chepo,” distributed to CHS-4 thirty bundles, containing a total of 420 packets, of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 12.0 grams, in exchange for \$1,800, and defendant SANTANA-GONZALEZ also distributed to CHS-4 two bundles, containing 60 packets of cocaine, weighing a total of approximately 16.89 grams, in exchange for \$220. Defendant SANTANA-GONZALEZ engaged in this hand-to-hand transaction with CHS-4 on the 3100 block of Weymouth Street.

46. On or about April 3, 2025, beginning at approximately 5:54 p.m., at 3153 Weymouth Street inside the “bunker,” defendants EDERICK RIVERA SANTIAGO-GONZALEZ, a/k/a “Negro,” a/k/a “Edri,” JUAN GOMEZ-RESTO, a/k/a “Pupo,” LUIS WILLIAMS, a/k/a “Prendi Pas,” and KELVIN AGUAYO-GARCIA, a/k/a “Negro,” met and spoke with each other. Defendant EDERICK RIVERA SANTIAGO-GONZALEZ counted a stack of money, which constituted drug proceeds.

47. On or about April 5, 2025, at approximately 6:27 p.m., at 3153 Weymouth Street inside the “bunker,” defendants RAMON ROMAN-MONTANEZ, a/k/a “Viejo” and JUAN GOMEZ-RESTO, a/k/a “Pupo,” discussed an issue about a lack of cocaine base (“crack”) available to customers. Defendant ROMAN-MONTANEZ blamed defendant GOMEZ-RESTO for the

problem and told defendant GOMEZ-RESTO that the lack of availability of cocaine base (“crack”) cost the organization approximately \$4,000. Defendant ROMAN-MONTANEZ told defendant GOMEZ-RESTO that the Weymouth DTO did “not have the rock for two days.” Defendant GOMEZ-RESTO acknowledged, saying “I will answer for it. I will answer for it.”

48. On or about April 9, 2025:

a. Between approximately 3:01 p.m. and 3:15 p.m., defendant WILFRED CASTILLO, a/k/a “Domi,” distributed to Buyer 8, a person known to the grand jury, 28 packets of fentanyl/heroin, stamped “RIFLAY,” on the 3100 block of Weymouth Street. Defendant CASTILLO also distributed to Buyer 9, a person known to the grand jury, two flip-top containers, containing cocaine base (“crack”), on the 3100 block of Weymouth Street.

b. At approximately 3:30 p.m., defendant WILFRED CASTILLO possessed, for the purposes of distribution on behalf of the Weymouth DTO, 14 packets of fentanyl/heroin, stamped “RIFLAY,” which he stored inside of a drainpipe on the 3100 block of Weymouth Street.

c. Inside a stash house at 3457 North Hope Street, Philadelphia, defendant RICHARD CARTAGENA, a/k/a “Richie,” possessed with the intent to distribute approximately 812 packets of fentanyl/heroin, each stamped “GRINCH,” weighing a total of approximately 25.7 grams, approximately 812 blue plastic flip-top containers of cocaine base (“crack”), weighing a total of approximately 71.5 grams, and approximately 300 gray flip top containers containing cocaine, weighing a total of approximately 23.6 grams, which he possessed with intent to distribute on behalf of the Weymouth DTO.

49. On or about April 14, 2025:

a. At approximately 5:13 p.m., CHS-6 placed a phone call to defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” during which CHS-6 placed an order for eighteen bundles of fentanyl/heroin, requesting the “RIFLAY” brand. Defendant RESTO-BERRIOS confirmed a price of \$55 per bundle.

b. At approximately 6:15 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” met with CHS-6 in front of 3140 Weymouth Street, defendant RESTO-BERRIOS’ residence, and again took the narcotics order from CHS-6.

c. Shortly thereafter, defendant JAVIER RESTO-BERRIOS entered 3140 Weymouth Street. Defendant RESTO-BERRIOS then exited 3140 Weymouth Street and distributed to CHS-6 eighteen bundles, containing a total of 252 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 7.87 grams, in exchange for \$990.

d. At approximately 6:20 p.m., defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan,” distributed to CHS-6 one bundle, containing a total of 16 packets of fentanyl/heroin, each stamped “GRINCH,” weighing a total of approximately 0.592 grams, in exchange for \$70, on the 3100 block of Weymouth Street.

50. On or about April 18, 2025:

a. At approximately 12:05 p.m., CHS-6 called defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” to place an order for fentanyl/heroin, requesting both the “RIFLAY” and “GRINCH”-stamped brands.

b. At approximately 12:35 p.m., defendant JAVIER RESTO-BERRIOS entered 3140 Weymouth Street with CHS-6. Once inside, defendant RESTO-BERRIOS distributed to CHS-6 twenty bundles, containing a total of 280 total packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 8.71 grams, in exchange for \$1,100. Defendant

RESTO-BERRIOS also distributed to CHS-6 two packets of fentanyl/heroin, stamped “CHECK OUT,” as a sample.

c. At approximately 12:47 p.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” distributed to CHS-6 ten bundles, containing a total of 160 total packets of fentanyl/heroin, each stamped “GRINCH,” weighing a total of approximately 5.36 grams, in exchange for \$600. CHS-6 had previously given the funds for these narcotics to defendant RESTO-BERRIOS at the time CHS-6 purchased the twenty bundles of RIFLAY-stamped fentanyl/heroin. Defendant AGUAYO-GARCIA engaged in the transaction with CHS-6 at or around the 3131 Weymouth Street, a location used and controlled by the Weymouth DTO.

51. On or about April 24, 2025, at 3153 Weymouth Street inside the “bunker,” Co-Conspirator 12 and Co-Conspirator 19, a person known to the grand jury, discussed an ongoing violent conflict between the Weymouth DTO and another drug organization located at 7th and Russell Streets in Philadelphia (hereinafter “the 7th and Russell DTO”). Co-Conspirator 12 blamed the 7th and Russell DTO for shooting a fellow DTO member, defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” on March 29, 2025. Co-Conspirator 12 told Co-Conspirator 19, and others unknown to the grand jury, “That’s why I have my rifle in the car... I know it’s them,” “If you beefing with me bro, it gon be like bro, when I catch you... Now that I’m expecting that I got beef with you ASAP,” and “If you tell me, yo, we beefing. And that’s it, I kill you. I’m a still respect you.”

52. On or about May 9, 2025:

a. At approximately 6:20 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with defendant WILFRED CASTILLO, a/k/a “Domi,” about the Weymouth DTO’s drug trafficking operations that day. Defendant CASTILLO asked how

many was given to defendant RESTO-BERRIOS the night before. Defendant RESTO-BERRIOS responded that he was given “three cocaine . . . fifteen . . . made two.” Defendant CASTILLO later followed up, “three, 15, and one.” Defendant RESTO-BERRIOS confirmed, and stated that he had the numbers in his head and memorized. Defendant CASTILLO stated that he was writing it down.

b. At approximately 1:31 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant JUAN GOMEZ-RESTO, a/k/a “Pupo,” on the phone about an expected parcel of narcotics to be shipped to the Weymouth DTO. Defendant RESTO-BERRIOS said that “it’s there,” and that “tomorrow” they would do the “thing.” Defendants RESTO-BERRIOS and GOMEZ-RESTO both told each other the address of “3140.”

c. At approximately 3:57 p.m., defendant JAVIER RESTO-BERRIOS called defendant NANCY RIOS-VALENTIN about the supply of controlled substances on the block. At one point, defendant RESTO-BERRIOS stated that there were “only eight” and he came to get more. Defendant RIOS-VALENTIN asked for clarification whether defendant RESTO-BERRIOS was talking about “the slow one.” Defendant RESTO-BERRIOS confirmed, and then stated there were “100 there” and he planned to take “50 out.” Defendant RIOS-VALENTIN acknowledged.

d. At approximately 4:41 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant NANCY RIOS-VALENTIN on the phone about who was working that day. Defendant RESTO-BERRIOS confirmed for defendant RIOS-VALENTIN that defendant ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” was working.

e. At approximately 4:45 p.m., defendant ANGEMILL GONZALEZ-CLAUDIO made a hand-to-hand transaction with a buyer on the 3100 block of Weymouth Street.

f. At approximately 6:21 p.m., a person unknown to the grand jury mailed a package containing fentanyl, in white powder form, from “THE UPS STORE 1240 E PLAZA BLVD SUITE 604 NATIONAL CITY CA 91950,” to “SERGIO PEREZ 3140 WEYMOUTH ST PHILADELPHIA PA.”

53. On or about May 10, 2025:

a. At approximately 6:53 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant WILFRED CASTILLO, a/k/a “Domi,” on the phone about upcoming drug shifts on the block. Defendant RESTO-BERRIOS said “Panza is today,” referring to Co-Conspirator 12. Defendant CASTILLO said that he was on the way.

b. At approximately 3:16 p.m., defendant WILFRED CASTILLO, on the 3100 block of Weymouth Street, received money from Co-Conspirator 20, a person unknown to the grand jury, who had just made a drug transaction on block. Defendant CASTILLO then handed the proceeds from the drug transaction to Co-Conspirator 12.

c. At approximately 6:27 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant NANCY RIOS-VALENTIN on the phone about the expected parcel of controlled substances to be shipped, which defendant RESTO-BERRIOS said that he believed would arrive that day and referred to as “snow.”

d. At approximately 6:37 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant JUAN GOMEZ-RESTO, a/k/a “Pupo,” on the phone about the expected parcel of controlled substances that was being shipped, referring to it as “the white stuff.” Defendant GOMEZ-RESTO said that if it had not yet been sent, it would be sent on Monday, and then stated that the sender would send, “one and half of another one.”

e. At approximately 8:10 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” on the phone about the supply of controlled substances for the block. Defendant AGUAYO-GARCIA told defendant RESTO-BERRIOS that defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” was going to get more cocaine base (“crack”), referring to it as “rock,” as well as more cocaine, referring to it as “white,” for defendant RESTO-BERRIOS to sell. Defendant AGUAYO-GARCIA asked defendant RESTO-BERRIOS to confirm how much fentanyl/heroin was available, referring to it as “slow.”

54. On or about May 11, 2025:

a. At approximately 3:50 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant NANCY RIOS-VALENTIN. Defendant RIOS-VALENTIN stated that there was “something missing,” and asked, “who was on the night before last?” Defendant RESTO-BERRIOS asked whether defendant RIOS-VALENTIN meant “in the afternoon, or at night?” Defendant RIOS-VALENTIN clarified that she meant the afternoon. Defendant RESTO-BERRIOS stated that “Chipi was on Wednesday,” “Karla” was on Thursday, and “Angel” had been on Friday, by himself.

b. At approximately 4:04 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” on the phone about cocaine base (“crack”). Defendant AGUAYO-GARCIA told defendant RESTO-BERRIOS to check the hidden areas to see if “Viejo” (i.e., defendant RAMON ROMAN-MONTANEZ) had left any “blue rocks” there.

55. On or about May 12, 2025, at approximately 4:08 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant CARLA DIAZ-RESTO, a/k/a “Karla.” Defendant RESTO-BERRIOS asked what “Viejo” (i.e., defendant RAMON ROMAN-

MONTANEZ) had told her about a recent day, and defendant DIAZ-RESTO complained that “all of a sudden they just took me off.” Defendant RESTO-BERRIOS asked if defendant DIAZ-RESTO had been taken off [her shift] “for Nancy,” and defendant DIAZ-RESTO responded that that no, it was supposedly “for Angel.” Defendant RESTO-BERRIOS replied that he would “have a talk” with Viejo to clarify the assigned shifts. Defendant DIAZ-RESTO reiterated that she wanted to know when her day—for a caseworker shift—would be, because she needed money.

56. On or about May 13, 2025, at approximately 7:01 a.m., defendant WILFRED CASTILLO, a/k/a “Domi,” spoke on the phone with defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” about the Weymouth DTO’s drug trafficking operations that day. Defendant CASTILLO said that he would bring controlled substances in a little while, but he could not at the current time because “those people” were being watched. Defendant RESTO-BERRIOS asked whether defendant CARLA DIAZ-RESTO, a/k/a “Karla,” had arrived on the block, and defendant CASTILLO responded that she was not yet there. Defendant CASTILLO stated that he gave 12 “L,” 10 “pepes,” and one other item to someone at the direction of defendant DIAZ-RESTO, referring to quantities of controlled substances. Defendant CASTILLO also stated that he was “going to leave the material well hidden.”

57. On or about May 14, 2025:

a. At approximately 6:16 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with defendant LUIS CRUZ. Defendant RESTO-BERRIOS asked defendant CRUZ what he had left, and defendant CRUZ responded that he had “three chickens,” and that “Negro” (i.e., defendant KELVIN AGUAYO-GARCIA) had already taken the profit. Defendant CRUZ clarified that there were “three bundles left and five up there,” referring to

quantities of fentanyl/heroin for sale, and that there were “eight rocks left,” referring to quantities of cocaine base (“crack”) for sale.

b. At approximately 10:17 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” on the phone. Defendant RESTO-BERRIOS told defendant AGUAYO-GARCIA that defendant RESTO-BERRIOS sold “20” bundles of heroin/fentanyl and had given another “25” to “Luis” (i.e., defendant LUIS CRUZ). Defendant AGUAYO-GARCIA said that he would come collect the drug proceeds, which he referred to as “tickets,” from defendant RESTO-BERRIOS.

c. At approximately 10:43 a.m., defendant KELVIN AGUAYO-GARCIA arrived by car at 3140 Weymouth Street and collected drug proceeds from defendant JAVIER RESTO-BERRIOS.

d. At approximately 2:33 p.m., defendant JAVIER RESTO-BERRIOS spoke with CHS-6 on the phone, and CHS-6 placed an order for 20 bundles of “Riflay” and for 10 bundles of “Grinch.” Defendant RESTO-BERRIOS stated that he would check in with “Negro” (i.e., defendant KELVIN AGUAYO-GARCIA) about the price for the Grinch-stamped fentanyl/heroin.

e. At approximately 2:38 p.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant KELVIN AGUAYO-GARCIA about whether the price for the Grinch-stamped bundles desired by CHS-6 should be \$65 dollars a bundle or \$60 dollars a bundle. Defendant AGUAYO-GARCIA said that defendant RESTO-BERRIOS can decide what to charge because defendant AGUAYO-GARCIA would get his share either way.

f. At approximately 3:14 p.m., defendant JAVIER RESTO-BERRIOS distributed to CHS-6 twenty bundles, containing a total of 280 packets, of fentanyl/heroin, each

stamped “RIFLAY,” weighing a total of approximately 10.9 grams, and ten bundles, containing a total 160 packets of fentanyl/heroin, each stamped “GRINCH,” weighing a total of approximately 6.59 grams, and 28 orange flip-top containers of cocaine base (“crack”), weighing a total of approximately 2.41 grams, in exchange for \$1,820. Defendant RESTO-BERRIOS engaged in the hand-to-hand transaction with CHS-6 inside of 3140 Weymouth Street, the residence of RESTO-BERRIOS.

g. At approximately 5:38 p.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant WILFRED CASTILLO, a/k/a “Domi,” and asked defendant CASTILLO how much cocaine he had. Defendant CASTILLO responded that he had “six.” Defendant RESTO-BERRIOS asked whether defendant CASTILLO had sold any cocaine because he had written down that CASTILLO had six at the beginning of the shift. Defendant CASTILLO responded that he had not yet sold any but he was “going to . . . now, you heard?”

h. At approximately 8:16 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant ANGEL RIOS-VALENTIN on the phone about the caseworker-shift schedule, and defendant RESTO-BERRIOS said that he was currently doing “Angel’s” (i.e., the shift of defendant RIOS-VALENTIN). Defendant RESTO-BERRIOS confirmed that he did the morning for himself and now he was doing it for “Angel.” Defendant RIOS-VALENTIN inquired into the recent sales of cocaine on the block and expressed frustration with the volume of sales. Defendants RESTO-BERRIOS and RIOS-VALENTIN discussed a new song by Co-Conspirator 11.

58. On or about May 15, 2025:

a. At approximately 2:09 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant JUAN GOMEZ-RESTO, a/k/a “Pupo,” on the phone about

the expected parcel of controlled substances to be shipped to the Weymouth DTO. Defendant and GOMEZ-RESTO told defendant RESTO-BERRIOS that the shipper told him “it” was out in the streets.

b. At approximately 7:11 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant ANGEL RIOS-VALENTIN on the phone about the affairs of the Weymouth DTO, including what the DTO made the day prior. Defendant RIOS-VALENTIN also asked defendant RESTO-BERRIOS to ask “Ramon” (i.e., defendant RAMON ROMAN-MONTANEZ) if there were any “chinitas,” a code word for controlled substances, and defendant RESTO-BERRIOS said none had been brought yet.

c. At approximately 8:31 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant JUAN GOMEZ-RESTO on the phone about the parcel again, and defendant RESTO-BERRIOS asked defendant GOMEZ-RESTO to check in with the shipper about the parcel.

59. On or about May 16, 2025:

a. At approximately 10:51 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with Co-Conspirator 21, a person known to the grand jury, on the phone, about the expected parcel of controlled substances to be shipped to the Weymouth DTO. Defendant JUAN GOMEZ-RESTO, a/k/a “Pupo,” who was in the presence of Co-Conspirator 21, chimed in from the background of the call and told defendant RESTO-BERRIOS that the package could not be delivered because it was “eight by eight,” and thus too large for the mailbox. Co-Conspirator 21 told defendant RESTO-BERRIOS that defendant RESTO-BERRIOS needed to wait outside because there had been an attempted delivery of the package, but it did not fit. Defendant GOMEZ-

RESTO then told defendant RESTO-BERRIOS that defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” needed to bring controlled substances to defendant GOMEZ-RESTO.

b. At approximately 10:52 a.m., defendant JAVIER RESTO-BERRIOS spoke with defendant JUAN GOMEZ-RESTO on the phone, telling defendant GOMEZ-RESTO that defendant KELVIN AGUAYO-GARCIA was waiting for “Viejo” (i.e., defendant RAMON ROMAN-MONTANEZ) to bring the supply of controlled substances to defendant AGUAYO-GARCIA.

c. At approximately 12:54 p.m., defendant JAVIER RESTO-BERRIOS called Co-Conspirator 22, a person known to the grand jury, and complained that the package had not arrived.

d. At approximately 7:12 p.m., the package addressed to “SERGIO PEREZ 3140 WEYMOUTH ST PHILADELPHIA PA,” which defendants JAVIER RESTO-BERRIOS, JUAN GOMEZ-RESTO, and NANCY RIOS-VALENTIN had discussed by phone over the prior several days and had attempted to possess, was located in Philadelphia. The package was a brown cardboard box, eight inches by eight inches in size, with “8 x 8 x 8” printed on the exterior of the cardboard box. Inside was a white powdery substance in plastic wrapping, containing a mixture and substance that contained fentanyl and carfentanyl, weighing approximately 449 grams.

60. On or about May 20, 2025:

a. At approximately 12:38 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant NANCY RIOS-VALENTIN on the phone, about who was working various shifts for the Weymouth DTO that day.

b. At approximately 5:36 p.m., defendant EDERICK RIVERA SANTIAGO-GONZALEZ, a/k/a “Negro,” a/k/a “Edri,” spoke with CHS-6 by phone about CHS-6 interest in acquiring bundles of fentanyl/heroin from the Weymouth DTO—and specifically from a product line associated with “Elio” (i.e., defendant ELLIOT MATTEI-RODRIGUEZ). Defendant RIVERA SANTIAGO-GONZALEZ told CHS-6 to come to 3100 Weymouth Street.

c. Shortly thereafter, CHS-6 spoke to defendant EDERICK RIVERA SANTIAGO-GONZALEZ again by phone and stated that CHS-6 needed “20” bundles of one type of fentanyl and “10” bundles of “Riflay.” Defendant JOSUE ONEIL ORTIZ-BETANCOURT joined the call and said that he would let his associates know of CHS-6’s order.

d. At approximately 6:16 p.m., defendant JOSUE ONEIL ORTIZ-BETANCOURT distributed to CHS-6, from inside of CHS-6’s vehicle, which was parked near the intersection of East Clearfield Street and Weymouth Street, ten bundles, containing a total of 139 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 5.53 grams, in exchange for \$550.

e. Shortly thereafter, CHS-6 called defendant EDERICK RIVERA SANTIAGO-GONZALEZ, while CHS-6 was in the vicinity of the 3100 block of Weymouth Street, to inquire about obtaining the rest of the bundles of fentanyl he had ordered. Defendant RIVERA SANTIAGO-GONAZALEZ directed CHS-6 to drive around the corner, park, and then meet with defendant RIVERA SANTIAGO-GONAZEZ’s associate, Co-Conspirator 23, a person known to the grand jury, who would provide CHS-6 the narcotics.

f. At approximately 6:34 p.m., Co-Conspirator 23, at the direction of defendant EDERICK RIVERA SANTIAGO-GONZALEZ distributed to CHS-6 twenty bundles,

containing a total of 315 packets of fentanyl/heroin, each stamped “DONALD TRUMP,” weighing a total of approximately 20.1 grams, in exchange for \$1,200.

61. On or about May 21, 2025:

a. At approximately 6:05 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with defendant HECTOR VEGA-MELENEDEZ, a/k/a “Tito,” about the Weymouth DTO’s drug trafficking operations that day. Defendant VEGA-MELENEDEZ stated that there must be “material” there because someone only had a little bit left. Defendant RESTO-BERRIOS instructed defendant VEGA-MELENEDEZ to talk to an unidentified female and stated that she was almost done. Defendant VEGA-MELENEDEZ asked whether there was “more of the slow one up there” and defendant RESTO-BERRIOS said yes. Defendant VEGA-MELENEDEZ stated that he would “pick up the tickets to give them to” defendant RESTO-BERRIOS.

b. At approximately 8:30 a.m., defendant JAVIER RESTO-BERRIOS spoke on the phone again with defendant HECTOR VEGA-MELENEDEZ, and defendant RESTO-BERRIOS asked how much “L” (referring to fentanyl/heroin) was “down there.” Defendant VEGA-MELENEDEZ answered that they have what defendant RESTO-BERRIOS had given to defendant VEGA-MELENEDEZ and one more, which was “already finished.” Defendants VEGA-MELENEDEZ and RESTO-BERRIOS agreed that defendant RESTO-BERRIOS gave defendant VEGA-MELENEDEZ 25 of the “L.” Defendant RESTO-BERRIOS then asked how much of the “hard one” defendant VEGA-MELENEDEZ had. Defendant VEGA-MELENEDEZ responded that there were 10, including what was outside. Defendant RESTO-BERRIOS then asked about the “white one.” Defendant VEGA-MELENEDEZ responded that he had three.

62. On or about May 22, 2025, at approximately 8:18 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant KELVIN AGUAYO-GARCIA, a/k/a

“Negro,” on the phone, about issues that needed to be fixed given that “Flaco” (i.e., defendant JOSE ANTONIO MORALES NIEVES) was in the area. Defendant AGUAYO-GARCIA referred to a problem with a worker on the block being “short” \$780 of drug proceeds and with the current supply of “rock” (i.e., cocaine base (“crack”)) being low.

63. On or about May 23, 2025:

a. At approximately 6:47 p.m., defendants JAVIER RESTO-BERRIOS, a/k/a “Chicken,” and KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone about the bundles of “slow” (i.e., fentanyl) available for sale, and stated that “Tito” (i.e., defendant HECTOR VEGA-MELENDZ) only had “three left.” Defendant AGUAYO-GARCIA told defendant RESTO-BERRIOS to obtain “ten” more bundles of fentanyl from the “bunker” at 3153 Weymouth Street, a location used by the Weymouth DTO to orchestrate drug-trafficking activities.

b. At approximately 6:50 p.m., defendant JAVIER RESTO-BERRIOS spoke with defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan,” on the phone about the quantity of fentanyl that was needed for sales by the Weymouth DTO on the street, and defendant VELEZ-GONZALEZ responded that the street-dealers needed “six bundles.” Defendant RESTO-BERRIOS said he would bring defendant VELEZ-GONZALEZ “ten” bundles.

c. At 6:53 p.m., defendant JAVIER RESTO-BERRIOS entered the bunker at 3153 Weymouth Street to obtain more bundles of fentanyl to be used for street sales by the Weymouth DTO.

64. On or about May 24, 2025:

a. At approximately 6:41 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with defendant CARLA DIAZ-RESTO, a/k/a “Karla,” on the phone, about who was covering the shift on the block. Defendant DIAZ-RESTO conveyed that “Nancy” had told

her there was “work for Tuesday down the block.” Defendant RESTO-BERRIOS replied that “Panza” (i.e., Co-Conspirator 12) was supposed to have the entire day.

b. At approximately 7:11 a.m., defendant JAVIER RESTO-BERRIOS spoke with defendant ADELEDA GONZALEZ, a/k/a “Moya,” on the phone about who was covering the shift on the block. Defendant GONZALEZ asked whether “Chochin” (i.e., defendant ELIUD OMAR MORALES-GARCIA) was working. Defendant RESTO-BERRIOS stated it was Co-Conspirator 12.

c. At approximately 11:14 a.m., Co-Conspirator 12 arrived on the 3100 block of Weymouth to carry out his drug shift on behalf of the Weymouth DTO.

65. On or about May 26, 2025:

a. At approximately 7:05 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with defendant WILFRED CASTILLO, a/k/a “Domi,” and defendant RESTO-BERRIOS asked defendant CASTILLO how much he had of the “slow,” referring to fentanyl/heroin for sale. Defendant CASTILLO responded that he had “ten bags.” Defendant RESTO-BERRIOS asked whether it was “just ten?” Defendant CASTILLO responded that in fact, he had forty-one. Defendant RESTO-BERRIOS asked defendant CASTILLO how much he had of cocaine. Defendant CASTILLO responded that he had “nine, nine, chief. Nine, I got from outside. You know, I have one stashed, so that’s exactly what I have in cocaine.”

b. At approximately 10:59 a.m., defendant JOSUE ONEIL ORTIZ-BETANCOURT, borrowing the phone of defendant JAVIER RESTO-BERRIOS, spoke on the phone with defendant JUAN GOMEZ-RESTO, a/k/a “Pupo,” about supplies of controlled substances. Defendant ORTIZ-BETANCOURT asked whether defendant GOMEZ-RESTO could

obtain “half a buck” of the “white one,” explaining that he (defendant ORTIZ-BETANCOURT) had someone who wanted it.

c. At approximately 11:03 a.m., defendant JUAN GOMEZ-RESTO called defendant JAVIER RESTO-BERRIOS to relate that one of the DTO’s Dominican sources of supply could provide “one of those pieces.” Defendant JOSUE ONEIL ORTIZ-BETANCOURT took the phone from defendant RESTO-BERRIOS and defendant GOMEZ-RESTO repeated that the Dominican source of supply has “half of one left” (i.e., half of a kilogram). Defendant ORTIZ-BETANCOURT confirmed that he could have it for “eight” and he continued to converse with defendant GOMEZ-RESTO about the supply possibility.

66. On or about May 28, 2025:

a. At approximately 12:36 p.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant JAIME OTERO-RODRIGUEZ, a/k/a “Pilon.” Defendant OTERO-RODRIGUEZ told defendant AGUAYO-GARCIA that defendant OTERO-RODRIGUEZ had one bundle that had twenty-two “rocks.” Defendant AGUAYO-GARCIA told defendant OTERO-RODRIGUEZ to set that one aside and take another bundle out.

b. At approximately 1:23 p.m., defendant KELVIN AGUAYO-GARCIA, spoke on the phone with defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin.” Defendant MORALES-GARCIA told defendant AGUAYO-GARCIA that “Mellao” was upset for being kicked of the Weymouth DTO and that “Mellao” wanted to get rid of everyone on the block and shoot “Flaco” (i.e., defendant JOSE ANTONIO MORALES NIEVES). Defendant MORALES-GARCIA told defendant AGUAYO-GARCIA that this was not going to be possible because, “who is going to find Flaco? Nobody knows where he lives. How is he going to kill him?”

c. At approximately 3:54 p.m., defendant KELVIN AGUAYO-GARCIA, spoke on the phone with defendant JAIME OTERO-RODRIGUEZ. Defendant AGUAYO-GARCIA told defendant OTERO-RODRIGUEZ that he was on his way to take two bundles of rock and take out money to give to “Viejo” (i.e. defendant RAMON ROMAN-MONTANEZ).

d. At approximately 3:58 p.m., defendant KELVIN AGUAYO-GARCIA, spoke on the phone again with defendant JAIME OTERO-RODRIGUEZ. Defendant OTERO-RODRIGUEZ told defendant AGUAYO-GARCIA that twenty were missing, and to check the pockets. Defendant AGUAYO-GARCIA told defendant OTERO-RODRIGUEZ that it was “twenty-four,” which is what “Sonia” (i.e. defendant SONIA RAMOS DE JESUS) had. The two continued discuss the amounts when eventually, defendant AGUAYO-GARCIA told defendant OTERO-RODRIGUEZ to subtract twenty for the hustler, 10 for a person unknown to the grand jury, and the other for “Viejo” (i.e. defendant RAMON ROMAN-MONTANEZ).

67. On or about May 29, 2025:

a. At approximately 9:32 a.m., defendant MAYRA MOLINA DEJESUS, a/k/a “Rubia,” spoke on the phone with defendant KELVIN AGUAYO-GARCIA, a/k/a, “Negro.” Defendant AGUAYO-GARCIA told defendant MOLINA DEJESUS that defendant AGUAYO-GARCIA needed defendant MOLINA DEJESUS to get out a “bundle” and give it to “Angie” (i.e. defendant ANGEMILL GONZALEZ-CLAUDIO). Defendant MOLINA DEJESUS asked if defendant GONZALEZ-CLAUDIO was the “chubby one.” Defendant AGUAYO-GARCIA told defendant MOLINA DEJESUS that it was “Eliot’s” (i.e. defendant ELLIOT MATTEI-RODRIGUEZ) cousin. Defendant AGUAYO-GARCIA went on to tell defendant MOLINA DEJESUS that defendant GONZALEZ-CLAUDIO was on his way and to give it to him.

Defendant AGUAYO-GARCIA confirmed that after giving one to defendant GONZALEZ-CLAUDIO, defendant MOLINA DEJESUS should have “three left.”

b. At approximately 12:22 p.m., defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” spoke on the phone with Co-Conspirator 12 using the phone of defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken.” Co-Conspirator 12 said that he needed more “L,” referring to fentanyl/heroin, and said that the “white shirts” are what is moving. Defendant ROMAN-MONTANEZ directed Co-Conspirator 12 to get in touch with “Nachito” (i.e., Co-Conspirator 24, a person known to the grand jury), to obtain the fentanyl/heroin packets for sale on his part of the block.

68. On or about May 31, 2025:

a. At approximately 5:53 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante.” Defendant AGUAYO-GARCIA told defendant LEVANTE-MEDINA that “Tito” (i.e., defendant HECTOR VEGA-MELENDZ) was working on that day. Defendant LEVANTE-MEDINA told defendant AGUAYO-GARCIA that everything needed to be good because “Flaco” (i.e., defendant JOSE ANTONIO MORALES NIEVES) was bringing in some new workers and that “Flaco” will be the person that will make the necessary changes.

b. At approximately 7:12 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with defendant WILFRED CASTILLO, a/k/a “Domi,” about the affairs of the Weymouth DTO’s drug trafficking operations that day. Defendant CASTILLO told defendant RESTO-BERRIOS that he passed “48 and 9” to another DTO member, and stated that defendant CARLA DIAZ-RESTO, a/k/a “Karla,” was supposed to be there. Defendant CASTILLO asked whether defendant RESTO-BERRIOS already knew how much he had.

Defendant RESTO-BERRIOS responded that it was 56. Defendant CASTILLO said that he squared away that and was planning to come back in a few hours.

c. At approximately 7:33 a.m., defendant KELVIN AGUAYO GARCIA spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan.” Defendant AGUAYO-GARCIA instructed VELEZ GONZALEZ to “square up” after he arrived on the block and then leave for a few minutes because law enforcement was spotted in the area. Defendant AGUAYO-GARCIA stated that an unidentified individual had to give defendant VELEZ-GONZALEZ “fifteen rock, four slow, and two cocaine,” referring to quantities of controlled substances.

d. At approximately 7:47 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS LEVANTE-MEDINA. Defendant LEVANTE-MEDINA told defendant AGUAYO-GARCIA that “Flaco” (i.e., defendant JOSE ANTONIO MORALES NIEVES) told defendant LEVANTE-MEDINA to give “whatever was made from the early morning” in drug proceeds. Defendant AGUAYO-GARCIA said he had the proceeds there with him and would take the proceeds to defendant LEVANTE-MEDINA at the “church.”

e. At approximately 8:25 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant MAYRA MOLINA DEJESUS a/k/a “Rubia.” Defendant AGUAYO-GARCIA asked defendant MOLINA DEJESUS how many “tickets” she had. Defendant MOLINA DEJESUS replied that she had six of rock and three of cocaine.

f. At approximately 8:29 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey.” Defendant AGUAYO-GARCIA stated that he spoke with “Elio” (i.e., defendant ELLIOT MATTEI-RODRIGUEZ) the other day about his bringing “Elio” a sample of controlled substances

to be supplied by defendant CARRILLO-CRESPO, and if “Elio” likes it, he will take “two or three.” Defendants AGUAYO-GARCIA and CARRILLO-CRESPO discussed that “Elio” (i.e., defendant MATTEI-RODRIGUEZ) received “20” kilograms and they further discussed the stamp that was on these kilograms, which defendant AGUAYO-GARCIA said was a good “product” and that people were liking.

g. At approximately 3:33 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant MAYRA MOLINA DEJESUS. Defendant AGUAYO-GARCIA asked defendant MOLINA DEJEUS if she had a cocaine ticket because “Pilon” (i.e., defendant JAIME OTERO-RODRIGUEZ) told defendant AGUAYO-GARCIA that defendant MOLINA DEJESUS had “one” to sell. Defendant MOLINA DEJESUS replied by saying that she gave defendant AGUAYO-GARCIA “three of cocaine and six.” Defendants AGUAYO-GARCIA and MOLINA DEJESUS continued to discuss the issue. Defendant AGUAYO-GARCIA told defendant MOLINA DEJESUS to open the door and conveyed “they are out” of cocaine.

h. At approximately 7:59 p.m., defendant JANDANIEL VELEZ-GONZALEZ spoke on the phone with defendant KELVIN AGUAYO-GARCIA, and stated that defendant LUIS LEVANTE-MEDINA brought him six. Defendant AGUAYO-GARCIA then asked if he gave defendant LEVANTE-MEDINA two “tickets” and whether he had taken out defendant AGUAYO-GARCIA’s earnings from these “tickets.” Defendant VELEZ-GONZALEZ confirmed that he did both things.

i. At approximately 9:21 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ. Defendant VELEZ-GONZALEZ confirmed he left “two bundles of the rock” for defendant AGUAYO-

GARCIA. Defendant AGUAYO-GARCIA asked if he took out defendant LUIS LEVANTE-MEDINA's earnings and defendant VELEZ-GONZALEZ confirmed that he had done so.

69. On or about June 1, 2025:

a. At approximately 6:05 a.m., defendant KELVIN AGUAYO-GARCIA a/k/a "Negro," spoke on the phone with defendant MAYRA MOLINA DEJESUS a/k/a "Rubia." Defendant MOLINA DEJESUS told defendant AGUAYO-GARCIA that she had "four tickets," one outside, and that there was not more hard after that. Defendant AGUAYO-GARCIA responded by saying that's six. Defendant MOLINA DEJESUS said that's not six, that's five and that the one defendant AGUAYO-GARCIA brought MOLINA DEJESUS yesterday was cocaine.

b. At approximately 11:39 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a "Chicken," spoke on the phone with a person unknown to the grand jury and conveyed that "Grande" (i.e., defendant JOHN DAVID LOPEZ-BORIA) was working the block for the Weymouth DTO at that time.

c. At approximately 1:47 p.m., defendant LUIS CRUZ spoke on the phone with defendant KELVIN AGUAYO-GARCIA, a/k/a "Negro." Defendant AGUAYO-GARCIA asked defendant CRUZ how many bundles of "Grinch" defendant CRUZ had left. Defendant CRUZ responded that he would tell him later and defendant AGUAYO-GARCIA said, "okay call me back."

d. At approximately 1:50 p.m., defendant LUIS CRUZ called defendant KELVIN AGUAYO-GARCIA back and told defendant AGUAYO-GARCIA that there were ten. Defendant AGUAYO-GARCIA said, "okay," and then told defendant CRUZ to leave those ten there and that those ten were defendant AGUAYO-GARCIA's because he already had them sold to

someone else along with 20 other bundles that defendant AGUAYO-GARCIA already had in his possession.

70. On or about June 2, 2025:

a. At approximately 5:44 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant LUIS CRUZ. Defendant AGUAYO-GARCIA instructed defendant CRUZ to take out all the “tickets” (i.e., drug proceeds) and call defendant AGUAYO-GARCIA when this was done.

b. At approximately 5:45 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant MAYRA MOLINA DEJESUS, a/k/a “Rubia,” about what “tickets” (i.e., drug proceeds) were there, and defendant MOLINA DEJESUS said she would figure it out and call defendant AGUAYO-GARCIA back.

c. At approximately 5:52 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS CRUZ, again discussing how many “tickets” (i.e., drug proceeds) defendant CRUZ had from “yesterday.” Defendant AGUAYO-GARCIA said he was at the corner and told defendant CRUZ to bring him the money.

d. Following these conversations about each of defendants LUIS CRUZ and MAYRA MOLINA DEJESUS bringing defendant KELVIN AGUAYO-GARCIA “tickets” (i.e., drug proceeds) they had on hand, between approximately 5:54 a.m. and 6:03 a.m., defendant CRUZ and defendant MOLINA DEJESUS each met with defendant AGUAYO-GARCIA on the street, who was driving a black Ford Taurus, and handed him items or U.S. currency.

71. On or about June 3, 2025:

a. At approximately 5:57 a.m., defendant KELVIN AGUAYO-GARCIA a/k/a “Negro,” spoke on the phone with defendant MAYRA MOLINA DEJESUS a/k/a

“Rubia.” Defendant MOLINA DEJESUS told defendant AGUAYO-GARCIA that she had four slow, four rocks, and one cocaine. Defendant AGUAYO-GARCIA stated that he was outside and in a hurry.

b. At approximately 6:42 a.m., defendant JAVIER RESTO-BERRIOS a/k/a “Chicken,” spoke on the phone with defendant WILFRED CASTILLO, a/k/a “Domi.” Defendant RESTO-BERRIOS asked if defendant CASTILLO sold anything. Defendant CASTILLO said that defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin,” was coming because defendant MORALES-GARCIA would be the one working that day.

c. At approximately 6:59 a.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant ELIUD OMAR MORALES-GARCIA. Defendant MORALES-GARCIA told defendant RESTO-BERRIOS that defendant MORALES-GARCIA was almost at the block to begin his shift, and that he would be working with defendant ADELEDA GONZALEZ, a/k/a “Moya,” that day.

d. At approximately 7:01 a.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant ADELEDA GONZALEZ. Defendant ADELEDA GONZALEZ stated that she was going to take her kids to school and was going to send her son in her place, to work the shift with defendant ELIUD OMAR MORALES-GARCIA.

e. At approximately 7:07 a.m., defendant WILFRED CASTILLO spoke on the phone with defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” about the Weymouth DTO’s drug trafficking operations that day. Defendant CASTILLO told defendant RESTO-BERRIOS that he passed 33 “L” and 9 “pepe.” Defendant CASTILLO asked defendant RESTO-BERRIOS to confirm that he heard him. Defendant RESTO-BERRIOS responded that he had in fact heard what was said.

f. At approximately 7:10 a.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant ELIUD OMAR MORALES-GARCIA about whether defendant ADELEDA GONZALEZ's son had arrived yet for his shift.

g. At approximately 8:15 a.m., defendant JAVIER RESTO-BERRIOS spoke with CHS-6, who placed an order for "25 of Riflay" and "10 of the Grinch," referring to quantities of fentanyl/heroin.

h. At approximately 8:44 a.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant CARLA DIAZ-RESTO, a/k/a "Karla," about who would be working various shifts for the Weymouth DTO that week. During the conversation, defendants RESTO-BERRIOS and DIAZ-RESTO debated whether "Nancy" (i.e., defendant NANCY RIOS-VALENTIN) or "Panza" (i.e., Co-Conspirator 12) would be working Wednesday's shift, and discussed whether "Angie," (i.e., defendant ANGEMILL GONZALEZ-CLAUDIO), "Panza" (i.e., Co-Conspirator 12) or "Elliot" (i.e., defendant ELLIOT MATTEI-RODRIGUEZ) would be given Friday's shift.

i. At approximately 11:11 a.m., CHS-6 arrived on the block and interacted with defendant JAVIER RESTO-BERRIOS.

j. Between approximately 11:14 a.m. and approximately 11:16 a.m., defendant JAVIER RESTO-BERRIOS went into and out of the Weymouth DTO's "bunker," located at 3153 Weymouth Street.

k. At approximately 11:19 a.m., defendant JAVIER RESTO-BERRIOS spoke with defendant KELVIN AGUAYO-GARCIA, a/k/a "Negro," on the phone. Defendant RESTO-BERRIOS, told defendant AGUAYO-GARCIA that someone needed "ten" and that he took the "ones" that defendant AGUAYO-GARCIA "left on the couch." Defendants RESTO-

BERRIOS and AGUAYO-GARCIA confirmed that defendant RESTO-BERRIOS would charge a price of \$65 per bundle.

l. Between approximately 11:17 a.m. and approximately 11:24 a.m., defendant JAVIER RESTO-BERRIOS distributed to CHS-6 ten bundles, containing a total of 160 packets of fentanyl/heroin, each stamped “GRINCH,” weighing a total of approximately 6.27 grams, also distributed to CHS-6 twenty-five bundles, containing a total of 350 packets of fentanyl/heroin, each stamped “RIFLAY,” weighing a total of approximately 12.77 grams, in exchange for a total of \$1,750. Defendant RESTO-BERRIOS engaged in the transaction with CHS-6, and called defendant KELVIN AGUAYO-GARCIA to confirm the price for the Grinch-stamped bundles as the transaction was occurring, from inside of 3140 Weymouth Street.

m. Throughout the day, including at approximately 2:16 p.m., defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin,” worked a case-worker shift on the block and engaged in hand-to-hand transactions on the block.

n. At approximately 2:54 p.m., defendant KELVIN AGUAYO-GARCIA, spoke on the phone with defendant MAYRA MOLINA DEJESUS, a/k/a “Rubia,” during which defendant AGUAYO-GARCIA told defendant MOLINA DEJESUS that he wanted to give the “tickets” (i.e., drug proceeds) she had to “Viejo” (i.e., defendant RAMON ROMAN-MONTANEZ). Within minutes, defendant AGUAYO-GARCIA met with defendant MOLINA DEJESUS inside her residence at 3122 Custer Street, a neighboring block to the 3100 block of Weymouth Street. At approximately 3:05 p.m., defendant AGUAYO-GARCIA returned to the 3100 block of Weymouth Street and met with defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” inside the “bunker” at 3153 Weymouth Street.

o. At approximately 3:17 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante.” Defendant LEVANTE-MEDINA told defendant AGUAYO-GARCIA that he was heading over so that defendant LEVANTE-MEDINA could get the “15,” referring to quantities of drug proceeds. In a subsequent phone call at 4:02 p.m., defendant AGUAYO-GARCIA clarified for defendant LEVANTE-MEDINA that he had “16.”

p. At approximately 4:53 p.m., defendant LUIS LEVANTE-MEDINA arrived on the 3100 block of Weymouth Street, riding a bicycle.

q. At 4:56 p.m., defendant KELVIN AGUAYO-GARCIA met with defendant LUIS LEVANTE-MEDINA at the intersection of Clearfield and Weymouth Streets. Defendant AGUAYO-GARCIA provided defendant LEVANTE-MEDINA with drug proceeds.

72. On or about June 4, 2025:

a. At approximately 7:30 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan,” about the Weymouth DTO’s drug trafficking operations that day. Defendant VELEZ-GONZALEZ asked how “much of the hard one” (i.e., cocaine base (“crack”)) and how much “lenta” (i.e., fentanyl/heroin) remained available for sale, and reported how much of each type of controlled substance he had on hand for sales.

b. At approximately 1:07 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” and stated that “all 20 chickens were sold out” and he had “10 tickets, plus two of the white thing.” Defendant ROMAN-MONTANEZ said he would be back in about 40 minutes. Defendant ROMAN-MONTANEZ instructed defendant AGUAYO-GARCIA to enter an area and look for

“two corn pots,” to open “the second one,” and in the middle, defendant AGUAYO-GARCIA would find “the pink ones, the green ones, the black ones, and the blue ones,” referring to controlled substances that were stashed inside the corn pot. Defendant AGUAYO-GARCIA said he would take “five.” Defendants AGUAYO-GARCIA and ROMAN-MONTANEZ discussed how good the “rocks” (i.e., increments of cocaine base (“crack”)) were and that they were selling fast.

c. At approximately 6:34 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JAIME OTERO-RODRIGUEZ, a/k/a “Pilon.” Defendant OTERO-RODRIGUEZ asked defendant AGUAYO-GARCIA how much defendant OTERO-RODRIGUEZ gave to defendant AGUAYO-GARCIA. Defendant AGUAYO-GARCIA stated, “I think you gave me six and one.” Defendant OTERO-RODRIGUEZ replied, saying he didn’t know if he gave defendant AGUAYO-GARCIA two cocaine or not. Defendant AGUAYO-GARCIA then told defendant OTERO-RODRIGUEZ that defendant AGUAYO-GARCIA gave defendant OTERO-RODRIGUEZ six and that he should have four hard ones left.

d. At approximately 6:41 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JAIME OTERO-RODRIGUEZ. Defendant AGUAYO-GARCIA asked defendant OTERO-RODRIGUEZ how much cocaine he had left. Defendant OTERO-RODRIGUEZ responded that he had one. Defendant AGUAYO-GARCIA responded that “Rubia” (i.e. defendant MAYRA MOLINA DEJESUS) had more because he had given her ten yesterday. Defendants AGUAYO-GARCIA and OTERO-RODRIGUEZ continued to discuss how much cocaine defendant MOLINA DEJESUS should have when defendant AGUAYO-GARCIA told defendant OTERO-RODRIGUEZ that he would call defendant MOLINA DEJESUS.

e. At approximately 6:43 p.m. KELVIN AGUAYO-GARCIA spoke on the phone with defendant MAYRA MOLINA DEJESUS, a/k/a “Rubia.” Defendant AGUAYO-GARCIA asked how much cocaine she had. Defendant MOLINA DEJESUS stated that she had eight. Defendant AGUAYO-GARCIA then told defendant MOLINA DEJESUS that defendant JAIME OTERO-RODRIGUEZ said he only had one left. Defendant MOLINA DEJESUS told defendant AGUAYO-GARCIA that she told defendant OTERO-RODRIGUEZ four. Defendant AGUAYO-GARCIA went on to say that defendant OTERO-RODRIGUEZ “squared” him off with the rocks that defendant MOLINA DEJESUS left defendant AGUAYO-GARCIA. The two continued to discuss cocaine sales and defendant MOLINA DEJESUS stated that they are getting sold like “hot cakes.” Defendant MOLINA DEJESUS stated that she had a customer that that is in another county, and she was going to ask defendant AGUAYO-GARCIA for ten or twenty bundles. Defendant AGUAYO-GARCIA said all right. Defendant MOLINA DEJESUS then stated that defendant AGUAYO-GARCIA’s money was secure, and she makes herself responsible for the money.

73. On or about June 5, 2025:

a. At approximately 6:24 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with defendant WILFRED CASTILLO, a/k/a “Domi,” about the Weymouth DTO’s drug trafficking operations that day. Defendant CASTILLO stated that he opened up the block again because defendant KELVIN AGUAYO GARCIA, a/k/a “Negro,” told him it was okay to do so.

b. At approximately 6:37 a.m., defendant LUIZ CRUZ spoke on the phone with defendant KELVIN AGUAYO-GARCIA. Defendant CRUZ said that he had a “120 cocaine ticket,” that he gave to a person not known to the grand jury. Defendant AGUAYO-

GARCIA told defendant CRUZ to “stash it,” and then told defendant CRUZ that defendant AGUAYO-GARCIA had to call defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” because defendant RESTO-BERRIOS was calling him.

74. On or about June 7, 2025:

a. At approximately 6:14 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant LUIS CRUZ and asked him if there were “10 rock tickets” (i.e., quantities of drug proceeds from sales of cocaine base (“crack”)). Defendant CRUZ confirmed that there were.

b. At approximately 6:15 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante,” and told him defendant AGUAYO-GARCIA had “10 tickets” from the shift last night, referring to quantities of drug proceeds.

c. At approximately 11:43 a.m., defendant KELVIN AGUAYO-GARCIA, spoke on the phone with defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” who told defendant AGUAYO-GARCIA that he only had “one bundle” left, referring to quantities of controlled substances available for sale by the Weymouth DTO.

d. At approximately 3:50 p.m., defendant KELVIN AGUAYO-GARCIA received a phone call from Co-Conspirator 25, from prison. Co-conspirator 25 asked defendant AGUAYO-GARCIA to help add money to his prison account, and defendant AGUAYO-GARCIA said “Nancy” (i.e., defendant NANCY RIOS-VALENTIN) would provide the funds. Defendant AGUAYO-GARCIA put defendant RAMON ROMAN-MONTANEZ on the phone, who said he would help reach out to an attorney for Co-Conspirator 25.

e. At approximately 10:30 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey,” about how “many numbers” defendant CARRILLO-CRESPO had received that day, because defendant AGUAYO-GARCIA was not sure whether “another ten”—referring to a quantity of drug proceeds—had been brought to defendant CARRILLO-CRESPO by “Diamante” (i.e., defendant LUIS LEVANTE-MEDINA). Defendant AGUAYO-GARCIA conveyed that he had another “fifteen” to give to defendant CARRILLO-CRESPO, referring to quantities of drug proceeds. Defendants AGUAYO-GARCIA and CARRILLO-CRESPO then discussed police activity in the area of Potter and Reach Streets in Philadelphia. Defendant AGUAYO-GARCIA said that the police had arrested multiple workers on Potter Street, a corner where “Eliot” (i.e., defendant ELLIOT MATTEI-RODRIGUEZ) oversees drug sales for the Weymouth DTO.

75. On or about June 9, 2025:

a. At approximately 7:10 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan.” Defendant AGUAYO-GARCIA asked how much that they had. Defendant VELEZ-GONZALEZ responded that they had “fifteen... five... and how much of slow? I think nine.” Defendant AGUAYO-GARCIA instructed him to coordinate with defendant HECTOR VEGA-MELENDEZ, a/k/a “Tito,” and defendant VELEZ-GONZALEZ said that he would call him.

b. At approximately 7:19 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with Co-Conspirator 22, about an expected “package” that might “arrive” between that day and Thursday. Defendant RESTO-BERRIOS asked Co-Conspirator 22 to ask a

third party to look out for the package and if it arrives, to hold onto it for defendant RESTO-BERRIOS.

c. Later that same day, an individual unknown to the grand jury placed a package in the USPS mail system in San Diego, California, weighing one pound and 6.9 ounces, with the listed address as “Pedro Aviles, 3311 Ella Street, Philadelphia, PA, 19134-1609,” which contained controlled substances to be received by the Weymouth DTO.

d. At approximately 4:45 p.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante.” Defendant AGUAYO-GARCIA discussed the fact that “Jowey” (i.e., defendant JOEL CARRILLO-CRESPO) had not resupplied defendant LEVANTE-MEDINA with controlled substances. Defendant AGUAYO-GARCIA told defendant LEVANTE-MEDINA that he would call defendant CARRILLO-CRESPO.

e. At approximately 4:47 p.m., defendant KELVIN AGUAYO-GARCIA, spoke with defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey,” on the phone. Defendant AGUAYO-GARCIA asked defendant CARRILLO-CRESPO when the 3100 block of Weymouth Street was going to be resupplied with controlled substances. Defendant CARRILLO-CRESPO said he would call back in five minutes.

f. At approximately 4:56 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JAIME OTERO-RODRIGUEZ, a/k/a “Pilon.” Defendant OTERO-RODRIGUEZ told defendant AGUAYO-GARCIA that OTERO-RODRIGUEZ had only two left of “hard” (i.e., cocaine base (“crack”)). Defendant AGUAYO-GARCIA said that he was waiting for defendant OTERO-RODRIGUEZ to give him the “ticket.” Approximately fifteen minutes later, defendants AGUAYO-GARCIA and OTERO-RODRIGUEZ

spoke again by phone, and defendant OTERO-RODRIGUEZ said he had “two more rock tickets” and has “one running.”

g. At approximately 5:23 p.m., defendant KELVIN AGUAYO-GARCIA spoke with defendant LUIS LEVANTE-MEDINA on the phone. Defendant AGUAYO-GARCIA told defendant LEVANTE-MEDINA that he had another five “tickets” (i.e., drug proceeds) to give him, and that defendant LEVANTE-MEDINA had to come down. Defendant LEVANTE-MEDINA stated that he would come down when he was done with his current involvement. Defendant LEVANTE-MEDINA also stated that he had called “Jowey” (i.e., defendant JOEL CARRILLO-CRESPO) “all day long,” and that “Jowey” told him that Co-Conspirator 26, a person known to the grand jury, was nowhere to be found. Defendant LEVANTE-MEDINA stated that if Co-conspirator 26 shows up, he will come down.

h. From approximately 5:26 p.m. through approximately 5:47 p.m., defendant KELVIN AGUAYO-GARCIA and defendant JOEL CARRILLO-CRESPO, spoke on the phone multiple times. During the calls, the two discussed the amount of “tickets” defendant AGUAYO-GARCIA had and the order that defendant AGUAYO-GARCIA was placing for the controlled substances that the Weymouth DTO needed for the resupply.

i. At approximately 6:36 p.m., defendant KELVIN AGUAYO-GARCIA spoke with defendant JOEL CARRILLO-CRESPO on the phone. Defendant AGUAYO-GARCIA told defendant CARRILLO-CRESPO that AGUAYO-GARCIA had been waiting for twenty minutes. Defendant CARRILLO-CRESPO confirmed that someone was on the way.

j. At approximately 6:50 p.m., defendant KELVIN AGUAYO-GARCIA spoke with defendant HECTOR VEGA-MELENDZ, a/k/a “Tito,” on the phone and

asked defendant VEGA-MELENDZ if everything was clear because defendant AGUAYO-GARCIA was coming down with “15.”

k. At approximately 7:13 p.m., defendant KELVIN AGUAYO-GARCIA spoke with defendant CHAYANNE HERRERA, a/k/a “Cito,” on the phone. Defendant AGUAYO-GARCIA complained to defendant HERRERA that the person that was supposed to make the delivery was nowhere to be found. Five minutes later, defendant AGUAYO-GARCIA told defendant HERRERA that he was leaving and that his “boy” knows where to go, and that defendant AGUAYO-GARCIA would give “his boy” a scooter.

l. At approximately 7:26 p.m., defendant KELVIN AGUAYO-GARCIA spoke with defendant HECTOR VEGA-MELENDZ on the phone and the two discussed the logistics of picking up the drug resupply. Defendant AGUAYO-GARCIA told defendant VEGA-MELENDZ that he had been there before, that defendant AGUAYO-GARCIA had sent him, and reminded him that the location was not a house but a “garage,” on the same street as a pizzeria. Defendant AGUAYO-GARCIA told defendant VEGA-MELENDZ he would bring him a scooter.

m. At approximately 7:56 p.m., defendant KELVIN AGUAYO-GARCIA spoke with defendant CHAYANNE HERRERA on the phone. Defendant HERRERA told defendant AGUAYO-GARCIA that the resupply person was “there.” Defendant AGUAYO-GARCIA told defendant HERRERA that AGUAYO-GARCIA would send someone to pick it up.

n. At approximately 7:57 p.m., defendant HECTOR VEGA-MELENDZ left the 3100 block of Weymouth Street on a scooter.

o. At approximately 8:10 p.m., defendant HECTOR VEGA-MELENDEZ arrived back on the 3100 block of Weymouth Street and stashed the resupply on the block.

p. At approximately 8:17 p.m., defendant KELVIN AGUAYO-GARCIA spoke with defendant JOEL CARRILLO-CRESPO on the phone and stated that the resupply had been picked up. Defendant AGUAYO-GARCIA complained about having to wait for two hours.

76. On or about June 10, 2025:

a. At approximately 8:35 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a Negro,” spoke on the phone with defendant LUIS CRUZ. Defendant CRUZ said customers were complaining that a recent product line of controlled substances was “burnt” and making too many bubbles.

b. At approximately 8:36 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey.” Defendant AGUAYO-GARCIA complained that they “may have rushed to cook the work yesterday,” stating that customers were complaining about the “work” and that it is not the same quality as recent batches. Defendant CARRILLO-CRESPO answered that the work was the “same” and there were “four left.” Defendant AGUAYO-GARCIA said that “10” (i.e., batches) moved well, but people are complaining about “the 15” that was delivered yesterday, because it tastes bad and there are sparks when users smoke it. Defendant AGUAYO-GARCIA stated that “even ‘Panza’” (referring to Co-Conspirator 12) “called... to say that a customer... called to complain.”

c. At approximately 8:52 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with defendant JUAN GOMEZ-RESTO, a/k/a “Pupo.”

Defendant RESTO-BERRIOS asked defendant GOMEZ-RESTO “what happened” with the sending of an expected parcel of controlled substances. Defendant GOMEZ-RESTO answered that his source said “it should arrive” either Wednesday or Thursday.

d. At approximately 10:54 a.m., defendant LUIS WILLIAMS, a/k/a “Prendi Pas,” engaged in a hand-to-hand sale of controlled substances at or near 608 Wishart Street, which is around the corner from the 3100 block of Weymouth Street, on behalf of the Weymouth DTO. Defendant WILLIAMS possessed approximately one packet of fentanyl/heroin intended for distribution, drug proceeds, and 19 flip-top containers of cocaine base (“crack”), weighing approximately 2.775 grams, also intended for distribution.

e. At approximately 2:54 p.m. and again at 4:49 p.m., defendants KELVIN AGUAYO-GARCIA and JOEL CARRILLO-CRESPO spoke on the phone about an opportunity for the Weymouth DTO to expand its sales of cocaine base (“crack”) to other nearby areas. Defendant AGUAYO-GARCIA observed that there is “no rock at all on F,” and defendant CARRILLO-CRESPO responded that they should take advantage of the opportunity.

77. On or about June 11, 2025:

a. At approximately 8:54 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey,” about quantities of drug-supplies and drug-trafficking proceeds, of the Weymouth DTO. Defendant CARRILLO-CRESPO inquired about a stamp being used by “Elio” (i.e., defendant ELLIOT MATTEI-RODRIGUEZ), which defendant MATTEI-RODRIGUEZ “got at 15,” and defendant AGUAYO-GARCIA said that “Eliot is getting 20 more this week” and that defendant AGUAYO-GARCIA will let defendant CARRILLO-CRESPO know when it comes in. Defendant

CARRILLO-CRESPO conveyed that he was familiar with that stamp—and has already worked with the packagers who prepare the product—and believes “there will be no issues.”

b. At approximately 1:10 p.m., Co-Conspirator 27, a person known to the grand jury, distributed to a confidential source utilized by the FBI (hereinafter “CHS-7”) thirty total packets of fentanyl/heroin, each stamped “DONALD TRUMP,” weighing a total of approximately 2.2 grams, and three blue flip-top containers containing a mixture and substance with a detectable amount of cocaine base (“crack”), weighing a total of approximately 0.44 grams. Co-Conspirator 27 engaged in the hand-to-hand transaction with CHS-7 on the 600 block of Wishart Street, in Philadelphia, which is approximately 0.2 miles from the 3100 block of Weymouth Street.

c. At approximately 1:48 p.m., defendant SONIA RAMOS DE JESUS distributed to CHS-7 two bundles containing a total of 32 packets of fentanyl/heroin, each stamped “PACMAN,” and eight green flip-top plastic containers containing a mixture and substance with a detectable amount of cocaine base (“crack”). Defendant RAMOS DE JESUS engaged in the hand-to-hand transaction with CHS-7 near the corner of Clementine and F Streets, in Philadelphia, which is approximately 0.1 miles from the 3100 block of Weymouth Street.

d. At approximately 2:25 p.m., Co-Conspirator 24 distributed to CHS-7 two bundles containing a total of 32 packets of fentanyl/heroin, each stamped “OCHO BLANCO,” weighing a total of approximately 2.41 grams. Co-Conspirator 24 engaged in the transaction with CHS-7 near the corner of Potter Street and East Clearfield Street, in Philadelphia, which is approximately 0.1 miles from the 3100 block of Weymouth Street. While on the block of Potter Street, CHS-7 also engaged with defendant JONATHAN TORRES, who was also selling controlled substances for the Weymouth DTO.

e. At approximately 2:39 p.m., defendant KELVIN AGUAYO-GARCIA, spoke on the phone with defendant JAIME OTERO-RODRIGUEZ, a/k/a “Pilon.” Defendant AGUAYO-GARCIA told defendant OTERO-RODRIGUEZ to bring “two tickets” to a bodega, so that defendant AGUAYO-GARCIA could then go to Viejo’s (i.e., defendant RAMON ROMAN-MONTANEZ’s) house and get “that” (i.e., more supplies of controlled substances). Defendant AGUAYO-GARCIA instructed defendant OTERO-RODRIGUEZ to eventually go to “Rubia’s” (i.e., the house of defendant MAYRA MOLINA DEJESUS).

f. At approximately 2:43 p.m. and then again at 2:53 p.m., defendants KELVIN AGUAYO-GARCIA and JAIME OTERO-RODRIGUEZ met near 3122 Custer Street.

g. At approximately 2:55 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant MAYRA MOLINA DEJESUS, a/k/a “Rubia,” and told her to “open the door for Pilon” (i.e., defendant JAIME OTERO-RODRIGUEZ) who was “there and loaded.”

78. On or about June 12, 2025:

a. At approximately 7:29 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with Co-Conspirator 22 about an expected parcel of controlled substances to be shipped through the mail. Defendant JAVIER RESTO-BERRIOS asked Co-Conspirator 22 if she got the address, and Co-Conspirator 22 replied that it was “3311 Ella Street,” which is her mother’s address. Co-Conspirator 22 also told defendant RESTO-BERRIOS that she instructed her mother to be alert to any packages. At approximately 7:47 a.m., defendant RESTO-BERRIOS spoke again with Co-Conspirator 22 on the phone and told her that he (defendant RESTO-BERRIOS) was now at Co-Conspirator 22’s mother’s house, she was making him a cup of coffee, and he was going to wait there for a while.

b. At approximately 10:16 a.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant JUAN GOMEZ-RESTO, a/k/a “Pupo.” Defendant RESTO-BERRIOS conveyed to defendant GOMEZ-RESTO he had been at the destination all morning, but nothing yet came. Defendant GOMEZ-RESTO said he would contact the “sender.”

c. At approximately 10:30 a.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant JUAN GOMEZ-RESTO. Defendant RESTO-BERRIOS asked defendant GOMEZ-RESTO if GOMEZ-RESTO was able to get a delivery time. Defendant GOMEZ-RESTO replied in the negative and told defendant RESTO-BERRIOS to ask around regarding what time packages are delivered. Defendant RESTO-BERRIOS said that his mother-in-law (i.e., Co-Conspirator 22’s mother) said postal deliveries usually are made “at about noon.” Defendant RESTO-BERRIOS said he would be there waiting.

d. At approximately 10:57 a.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with Co-Conspirator 22, and told her that he was still at the house and that UPS had dropped off packages next door, but the package they were expected had not yet arrived.

e. At approximately 2:09 p.m. and again at 2:11 p.m., defendant JAVIER RESTO-BERRIOS, spoke on the phone with defendant JUAN GOMEZ-RESTO about the expected package of controlled substances that had not yet arrived. Defendant GOMEZ-RESTO said that he did not know what was happening—that it was like “last time”—and that he would make a call to inquire. Defendant GOMEZ-RESTO asked defendant RESTO-BERRIOS to confirm the address, so that he could check that the sender got it right, and defendant RESTO-BERRIOS said “3311” of “Ella.”

f. At approximately 5:17 p.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant JUAN GOMEZ-RESTO. The two discussed the fact that the

package had still not arrived and possible reasons for why it was not there, including that the post office may have stolen the package. Defendant GOMEZ-RESTO said that the person who sent the package was going to send another one as a test. Defendants RESTO-BERRIOS and GOMEZ-RESTO agreed that the next package should be sent to RESTO-BERRIOS' location.

g. Between approximately 6:35 p.m. and 6:45 p.m., defendant LUIS WILLIAMS, a/k/a "Prendi Pas," made hand-to-hand sales of packets of fentanyl on the 600 block of East Wishart Street in Philadelphia, around the corner from the 3100 block of Weymouth Street, on behalf of the Weymouth DTO, and possessed approximately 180 packets of fentanyl, each stamped "DONALD TRUMP," weighing a total of approximately 13.35 grams, with the intent to distribute those controlled substances.

h. Throughout the day, defendants JAVIER RESTO-BERRIOS, a/k/a "Chicken," and JUAN GOMEZ-RESTO, a/k/a "Pupo," agreed to and attempted to possess a package destined for "3311 Ella Street, Philadelphia, PA," containing approximately 485.38 grams of a mixture and substance containing a detectable amount of fentanyl. Defendants RESTO-BERRIOS and GOMEZ-RESTO attempted to possess this fentanyl on behalf of, and to be distributed by, the Weymouth DTO.

79. On or about June 13, 2025:

a. At approximately 9:21 a.m., defendant HECTOR VEGA-MELENDEZ, a/k/a "Tito," spoke on the phone with defendant KELVIN AGUAYO-GARCIA, a/k/a "Negro." Defendant AGUAYO-GARCIA asked defendant VEGA-MELENDEZ what he gave to defendant LUIS CRUZ, and stated that defendant ELIUD OMAR MORALES-GARCIA, a/k/a "Chochin," had about "20 of slow." Defendant VEGA-MELENDEZ responded, referring to the "slow," that he had five inside and three that someone had outside.

b. At approximately 4:07 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant ELIUD OMAR MORALES-GARCIA. Defendant MORALES-GARCIA told defendant AGUAYO-GARCIA to let “Viejo” (i.e., defendant RAMON ROMAN-MONTANEZ) know that “it is there so he can move it,” clarifying that defendant MORALES-GARCIA was referring to the location of a “tire” that defendant ROMAN-MONTANEZ and others had previously used as a hiding place.

c. At approximately 5:04 p.m., defendant KEVLIN AGUAYO-GARCIA spoke on the phone with defendant HECTOR VEGA-MELENDEZ. Defendant AGUAYO-GARCIA warned defendant VEGA-MELENDEZ that there were thirteen Strike Force vehicles in the area of 3100 Weymouth Street. Defendant VEGA-MELENDEZ relayed the message about the patrol cars to someone near him.

d. At approximately 8:24 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant HECTOR VEGA-MELENDEZ. Defendant VEGA-MELENDEZ said that there was a buyer present who wanted “five Grinch chickens,” referring to bundles of Grinch-stamped fentanyl. Defendant AGUAYO-GARCIA reminded defendant VEGA-MELENDEZ that VEGA-MELENDEZ already had the supply available.

e. At approximately 8:47 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant HECTOR VEGA-MELENDEZ. Defendant AGUAYO-GARCIA told defendant VEGA-MELENDEZ that AGUAYO-GARCIA was going to have “Guera,” take defendant LUIS CRUZ’s spot because defendant CRUZ did not show up to work the block. Defendant AGUAYO-GARCIA then called defendant CRUZ on another phone while defendant VEGA-MELENDEZ was still on the line. Defendant CRUZ told defendant AGUAYO-GARCIA that he was trying to help someone out but will come back to the block if

needed. Defendant AGUAYO-GARCIA told defendant CRUZ that defendant CRUZ knew that he had to work that day. Defendant AGUAYO-GARCIA then hung up on defendant CRUZ and continued his conversation with defendant VEGA-MELENDEZ. Defendants AGUAYO-GARCIA and VEGA-MELENDEZ discussed setting up the block. Defendant VEGA-MELENDEZ told defendant AGUAYO-GARCIA that VEGA-MELENDEZ had “four out running, five hidden, and six tickets for a total of fifteen.” Defendant VEGA-MELENDEZ added that there were a lot of customers that came in.

80. On or about June 14, 2025:

a. At approximately 4:14 p.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan.” Defendant AGUAYO-GARCIA asked if he had “50 of the new package.” Defendant VELEZ-GONZALEZ responded by saying that he had given twenty to defendant AGUAYO-GARCIA. Defendant AGUAYO-GARCIA clarified that he was talking about “the one that’s moving right now.” Defendant VELEZ-GONZALEZ responded by saying that he understood and that “those are three chickens and the ones I just brought you; the two tickets I just gave you, that’s the five.”

b. At approximately 5:19 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ. Defendant VELEZ-GONZALEZ said he needed “more of the slow one” (i.e., bundles of fentanyl/heroin). Defendant AGUAYO-GARCIA told defendant VELEZ-GONZALEZ that he would call “Viejo” (i.e., defendant RAMON ROMAN-MONTANEZ).

81. On or about June 15, 2025:

a. At approximately 8:20 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan.” Defendant AGUAYO-GARCIA asked about money that defendant VELEZ-GONZALEZ had left on a table outside, and defendant VELEZ-GONZALEZ explained that it was “three tickets of slow” (i.e., drug proceeds from sales of fentanyl/heroin). About fifteen minutes later, defendants AGUAYO-GARCIA and VELEZ-GONZALEZ spoke again by phone, discussing drug proceeds that were apparently missing and who was going to be paid what amount. Defendant LUIS CRUZ joined the conversation and stated that he had been given “500.” The conversation concluded with defendant AGUAYO-GARCIA stating that a portion of the proceeds were “Flaco’s” (i.e., for defendant JOSE ANTONIO MORALES NIEVES).

b. At approximately 8:43 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ. Defendant VELEZ-GONZALEZ shared that “Flaco” (i.e., defendant JOSE ANTONIO MORALES NIEVES) was going to be coming “down” soon, and defendant AGUAYO-GARCIA responded that he would be waiting for “those tickets” (i.e., drug proceeds) and defendant AGUAYO-GARCIA needed to bring the tickets to defendant MORALES NIEVES.

82. On or about June 19, 2025:

a. At approximately 6:21 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke on the phone with defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” about police presence near the 3100 block of Weymouth Street. Defendant AGUAYO-GARCIA told defendant RESTO-BERRIOS that “Grande” (i.e., defendant JOHN DAVID LOPEZ-BORIA) had to close down for ten minutes and then had opened again. Defendant AGUAYO-GARCIA told defendant RESTO-BERRIOS an indictment is going to be needed to take them

down and the only way a judge would not give them bail is if there is an indictment. Defendant RESTO-BERRIOS then said that he spoke with defendant RICHARD CARTAGENA, a/k/a “Richie,” from jail the prior day, and that defendant RESTO-BERRIOS included defendant RAMON ROMAN-MONTANEZ on the call because defendant ROMAN-MONTANEZ is trying to get defendant CARTAGENA’s bail lowered.

b. At approximately 8:38 p.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant ANGEL RIOS-VALENTIN. Defendant RIOS-VALENTIN asked whether defendant RESTO-BERRIOS had found some more, and defendant RESTO-BERRIOS said that he found “21,” referring to a quantity of controlled substances. Defendant RIOS-VALENTIN responded by saying that he would send someone to pick it up. Approximately twenty minutes later, defendant RIOS-VALENTIN told defendant RESTO-BERRIOS that the person was there for the pick-up. Defendant RESTO-BERRIOS said he would call “Chochin” (i.e., defendant ELIUD OMAR MORALES-GARCIA), because defendant RESTO-BERRIOS had given the supply to “Chochin,” to in turn give it to defendant RIOS-VALENTIN’s pick-up person.

c. At approximately 8:59 p.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” and told defendant AGUAYO-GARCIA that the “taxi driver” was there to pick up “Angel’s chinitas,” referring to little orange-capsules of cocaine base (“crack”) to be provided to defendant ANGEL RIOS-VALENTIN. Defendant RESTO-BERRIOS said to let “Chochin” (i.e., defendant ELIUD OMAR MORALES-GARCIA) know. Defendant AGUAYO-GARCIA responded that he would call “Chochin.”

d. At approximately 8:59 p.m., a grey Honda Odyssey arrived at 3140 Weymouth Street, in Philadelphia, to retrieve the supply of cocaine base (“crack”) in orange

capsules for defendant ANGEL RIOS-VALENTIN. At or around 10:10 p.m., the grey Honda Odyssey transported the cocaine base (“crack”) to defendant RIOS-VALENTIN in Milleville, New Jersey, so that he could further distribute it to customers of the Weymouth DTO.

83. On or about June 25, 2025:

a. At approximately 12:46 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” spoke with CHS-6 by phone, about a proposed drug sale. CHS-6 placed an order of 50 bundles of “Grinch.” Defendant RESTO-BERRIOS suggested a price of \$60 per bundle.

b. At approximately 12:51 p.m., defendant JAVIER RESTO-BERRIOS spoke on the phone with defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” and told him that he needed “50” of defendant AGUAYO-GARCIA’s “chickens,” referring to bundles of fentanyl. Defendant AGUAYO-GARCIA said he would check if he had the product.

c. At approximately 1:34 p.m., defendants JAVIER RESTO-BERRIOS and KELVIN AGUAYO-GARCIA met with CHS-6 on the 3100 block of Weymouth Street, and then distributed to CHS-6 fifty-seven bundles, containing a total of 902 packets of fentanyl/heroin, each stamped “GRINCH,” weighing a total of approximately 37.44 grams, in exchange for \$3,720. Defendants RESTO-BERRIOS and AGUAYO-GARCIA consummated the sale to CHS-6 and counted and collected payment from CHS-6 inside of the “bunker” used by the Weymouth DTO, located at 3153 Weymouth Street.

d. At approximately 2:03 p.m., defendant JAVIER RESTO-BERRIOS spoke by phone with CHS-6 about the recent drug transaction. CHS-6 thanked defendant RESTO-BERRIOS for getting him a good price, and said he will want to purchase more fentanyl in the future. Defendant RESTO-BERRIOS concurred.

e. At approximately 4:36 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JANDANIEL VELEZ-GONZALEZ, a/k/a “Jan.” Defendant AGUAYO-GARCIA said he tried to contact “Tito” (i.e., defendant HECTOR VEGA-MELENDZ) and tell him to bring “Elio’s” (i.e., defendant ELLIOT MATTEI-RODRIGUEZ) “49 tickets,” referring to drug proceeds owed to defendant MATTEI-RODRIGUEZ.

84. On or about June 29, 2025, at approximately 4:59 p.m., Co-Conspirator 24 called defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” on the phone, and offered him “rocks,” referring to cocaine base (“crack”) that could be used for sales by the Weymouth DTO. Defendant RESTO-BERRIOS replied that he just received a supply of cocaine base (“crack”) from another source.

85. On or about July 3, 2025, at approximately 6:56 a.m., defendant CARLA DIAZ-RESTO, a/k/a “Karla,” spoke with defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” on the phone. Defendant DIAZ-RESTO told defendant RESTO-BERRIOS to tell Co-Conspirator 24 that defendant DIAZ-RESTO was on her way and not give her shift to anyone else because it was defendant DIAZ-RESTO’s turn. Defendant RESTO-BERRIOS told defendant DIAZ-RESTO that Co-Conspirator 12 was there and had been since last night.

86. On or about July 23, 2025:

a. At approximately 10:15 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo.” Defendant AGUAYO-GARCIA stated that they needed “L” (referring to fentanyl) and “white” (referring to cocaine) “up there.” Defendant ROMAN-MONTANEZ responded that the controlled substances were “here” with “the roosters,” and the fentanyl was in the bucket for

the corn. Defendant AGUAYO-GARCIA asked if he should take out “50 and one ball,” and defendant ROMAN-MONTANEZ agreed.

b. At approximately 3:31 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant CHAYANNE HERRERA, a/k/a “Cito.” Defendant AGUAYO-GARCIA said he wanted to go over and get “ten,” referring to a quantity of controlled substances.

c. At approximately 3:41 p.m., defendants KELVIN AGUAYO-GARCIA and CHAYANNE HERRERA met inside of a garage at 3326 Rorer Street, in Philadelphia, for a few minutes, during which time defendant AGUAYO-GARCIA received the supply of controlled substances he requested.

d. At approximately 4:45 p.m., defendant CHAYANNE HERRERA spoke on the phone with defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey.” Defendants HERRERA and CARRILLO-CRESPO debated the share of drug proceeds that HERRERA would be receiving.

e. At approximately 6:04 p.m., defendant CHAYANNE HERRERA spoke on the phone again with defendant JOEL CARRILLO-CRESPO. Defendant CARRILLO-CRESPO asked, “how many” defendant HERRERA had left, and defendant HERRERA responded that he had “ten.” Defendant CARRILLO-CRESPO said he would take more controlled substances to the Rorer Street garage and leave them on the stove. Shortly after the phone call, defendant CARRILLO-CRESPO drove to the garage located at 3326 Rorer Street, in Philadelphia. Before the phone call, defendant HERRERA had also been at the garage located at 3326 Rorer Street, in Philadelphia.

f. At approximately 7:26 p.m., defendant CHAYANNE HERRERA spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante,” about quantities of drug proceeds and controlled substances. Defendant LEVANTE-MEDINA asked defendant HERRERA for “the numbers,” trying to determine how many tickets HERRERA collected for the Weymouth DTO.

g. At approximately 9:19 p.m., defendant CHAYANNE HERRERA spoke on the phone with defendant JOEL CARRILLO-CRESPO. Defendant CARRILLO-CRESPO said that he added “forty” to the “ten” that were there, so there was now “fifty,” referring to a supply of controlled substances to be made available for sale by the Weymouth DTO at the Rorer Street garage.

87. On or about July 25, 2025:

a. At approximately 8:47 p.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant JOHN DAVID LOPEZ BORIA, a/k/a “Grande.” Defendant AGUAYO-GARCIA asked if defendant LOPEZ BORIA could work now and indicated that it would be 11 o’clock when “Angie” (i.e., defendant ANGEMILL GONZALEZ-CLAUDIO) leaves. Defendant AGUAYO GARCIA said that defendant LOPEZ-BORIA would be at the bottom of the block and that defendant LOPEZ-BORIA could keep everything he makes, as always.

b. Between approximately 8:52 p.m. and 8:55 p.m., defendant JOHN DAVID LOPEZ BORIA arrived on the 3100 block of Weymouth Street in a vehicle, got out, and interacted with defendant KELVIN AGUAYO-GARCIA.

c. At approximately 8:59 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante.”

Defendant AGUAYO-GARCIA said that he had left “them” on the block with “Grande” (referring to “tickets” or drug proceeds) and told defendant LEVANTE-MEDINA to “bring 11” (referring to new quantities of controlled substances).

d. At approximately 9:14 p.m., defendant KELVIN AGUAYO-GARCIA called defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey,” on the phone, and told defendant CARRILLO-CRESPO that he had left the tickets there with “Grande” and that “Grande” was waiting for defendant LUIS LEVANTE-MEDINA.

e. At approximately 9:19 p.m., defendant LUIS LEVANTE-MEDINA left the garage at 3326 Rorer Street on a bicycle and went to 3100 Weymouth Street.

88. On or about July 26, 2025:

a. At approximately 9:01 a.m., defendant SANDINO JOSE HIDALGO GENAO, a/k/a “Domi,” spoke on the phone with defendant ELIUD MORALES-GARCIA, a/k/a “Chochin.” Defendants MORALES-GARCIA and HIDALGO GENAO discussed meeting and confirmed each was on the way.

b. At approximately 2:59 p.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo.” Defendant AGUAYO-GARCIA said he was on his way to defendant ROMAN-MONTANEZ’s house and asked if he should grab the supply that defendant ROMAN-MONTANEZ had on hand so that the street-dealers were not “dry.” Defendant ROMAN-MONTANEZ told defendant AGUAYO-GARCIA that he could grab a stash of controlled substances that were on the balcony.

c. At approximately 3:01 p.m., defendant KELVIN AGUAYO-GARCIA arrived at 3152 Weymouth Street, the residence of defendant RAMON ROMAN-

MONTANEZ and a location used by the Weymouth DTO to store controlled substances, and defendant AGUAYO-GARCIA retrieved the controlled substances from the porch. Shortly thereafter, defendant AGUAYO-GARCIA engaged in hand-to-hand transaction on the block.

d. At approximately 3:55 p.m., defendant SANDINO JOSE HIDALGO GENAO spoke on the phone with defendant RAMON ROMAN-MONTANEZ about a recent batch of fentanyl that defendant HIDALGO GENAO had provided for the Weymouth DTO. Defendant ROMAN-MONTANEZ said it would be even better if defendant HIDALGO GENAO could make it stronger. Defendant HIDALGO-GENAO replied that if he makes it stronger, it will kill them. Later in the call, defendant ROMAN-MONTANEZ instructed defendant HIDALGO GENAO to make a batch with less “fuerza” to see if it burns lighter, and defendant HIDALGO GENAO asked if he should still make “50,” to which defendant ROMAN-MONTANEZ answered yes.

89. On or about July 28, 2025:

a. At approximately 6:40 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke with defendant MAYRA MOLINA DEJESUS, a/k/a “Rubia,” on the phone. Defendant AGUAYO-GARCIA asked what “tickets” (i.e., drug proceeds) that defendant MOLINA DEJESUS had, and she responded that she had four for “rock” (i.e., proceeds for sales of cocaine base (“crack”)) and two for “coke” (i.e., proceeds for sale of cocaine).

b. At approximately 8:06 a.m., defendant KELVIN AGUAYO-GARCIA met with defendant MAYRA MOLINA DEJESUS at defendant MOLINA DEJESUS’s residence at 3122 Custer Street, in Philadelphia, and retrieved drug proceeds from her, to be turned over to the Weymouth DTO.

c. At approximately 10:19 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo.”

Defendant AGUAYO-GARCIA asked if he could enter “next door” and get some “white,” referring to a quantity of controlled substances. Defendant ROMAN-MONTANEZ answered in the affirmative. Two minutes after this phone call, defendant AGUAYO-GARCIA entered 3150 Weymouth Street, an address used by the Weymouth DTO to store controlled substances, in order to retrieve the supply of controlled substances.

d. At approximately 11:47 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante.” Defendant AGUAYO-GARCIA said he had “nine” and was waiting for one more to give defendant LEVANTE-MEDINA “ten.” At approximately 12:29 p.m., defendant AGUAYO-GARCIA again spoke with defendant LEVANTE-MEDINA on the phone, and said he had the “tickets” for defendant LEVANTE-MEDINA.

e. At approximately 1:22 p.m., defendant KELVIN AGUAYO-GARCIA and defendant LUIS LEVANTE-MEDINA convened in the vicinity of 3326 Rorer Street. Defendant LEVANTE-MEDINA reached inside of defendant AGUAYO-GARCIA’s vehicle through the passenger side window and retrieved the drug proceeds that defendant AGUAYO-GARCIA had referred to previously.

f. At approximately 1:33 p.m., defendant LUIS LEVANTE-MEDINA departed 3326 Rorer Street on a motorized bike. A few minutes later, defendant LEVANTE-MEDINA arrived on 3100 Weymouth Street and tossed a clear bag that appeared to contain unidentified orange items to an unknown person on the east side of Weymouth Street near 3115/3117 Weymouth Street.

g. At approximately 4:31 p.m., defendant JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco,” spoke on the phone with defendant CHAYANNE HERRERA, a/k/a

“Cito.” During this call, they discussed problems that defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey,” was causing the Weymouth DTO. At one point, defendant MORALES NIEVES stated that he “owes me almost 50,000 bucks from rent up there. Almost 50,000 bucks because he says he’s been squaring up as if it was 10 bucks, but it is 15 bucks.”

90. On or about July 29, 2025, at approximately 12:30 p.m., defendant CHAYANNE HERRERA, a/k/a “Cito,” spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante.” Defendant LEVANTE-MEDINA scolded defendant HERRERA for leaving the small door to the garage—referring to the garage at 3326 Rorer Street, in which the DTO stores controlled substances included cocaine base (“crack”)—open and unlocked the night before.

91. On or about July 30, 2025:

a. At approximately 12:20 p.m., CHS-6 asked a person on the 3100 block of Weymouth Street to place a phone call to defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro.” CHS-6 then spoke to defendant AGUAYO-GARCIA on the phone and told him he was looking to purchase “at least 60 or 70” bundles of fentanyl. Defendant AGUAYO-GARCIA responded that he would come to the block now and try to obtain 50 bundles to sell to CHS-6.

b. At approximately 12:53 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin.” Defendant AGUAYO-GARCIA instructed defendant MORALES-GARCIA to order “30” more of “Grinch” urgently.

c. At approximately 12:55 p.m., defendant KELVIN AGUAYO-GARCIA distributed to CHS-6 thirty bundles of fentanyl/heroin, each stamped “GRINCH,” in exchange for \$1,800. Defendant AGUAYO-GARCIA engaged in the transaction with CHS-6 in the

“bunker” used by the Weymouth DTO, located at 3153 Weymouth Street. Defendant AGUAYO-GARCIA told CHS-6 that he could have the rest of the controlled substances ordered by CHS-6 ready in about two hours.

d. At approximately 12:55 p.m., defendant ELIUD OMAR MORALES-GARCIA called defendant SANDINO JOSE HIDALGO GENAO, a/k/a “Domi.” Defendant MORALES-GARCIA asked for more “Grinch.” Defendant HIDALGO GENAO said he had asked about that yesterday, and defendant MORALES-GARCIA answered that he needed more because the prior supply “sold all at once.” Defendant HIDALGO GENAO said he will go to “the house” to work on the order.

e. At approximately 6:15 p.m., defendant SANDINO JOSE HIDALGO GENAO told defendant ELIUD OMAR MORALES-GARCIA that the supply was ready. Defendant MORALES-GARCIA told defendant HIDALGO GENAO to go ahead.

f. At approximately 6:19 p.m., defendant SANDINO JOSE HIDALGO GENAO departed his residence at 6217 Tackawanna Street, in Philadelphia, and drove to the vicinity of Hawthorne Street and Creston Street near Wissinoming Park. Defendant HIDALGO GENAO exited his car and walked over to the car of defendant ELIUD OMAR MORALES-GARCIA, which was parked on Comly Street. Defendant HIDALGO GENAO put a bag into defendant MORALES-GARCIA’s car, through the passenger-side front window. Defendant MORALES-GARCIA then drove to the 3100 block of Weymouth Street and brought the new supply of controlled substances into the “bunker,” located at 3153 Weymouth Street.

g. At approximately 6:44 p.m., defendant KELVIN AGUAYO-GARCIA entered the bunker, located at 3153 Weymouth Street, with CHS-6. Defendant AGUAYO-GARCIA then distributed to CHS-6 forty bundles of fentanyl/heroin, each stamped

“GRINCH,” in exchange for \$2,400, and 277 flip-top containers containing cocaine base (“crack”), weighing approximately 32.4 grams, in exchange for \$1,200. Altogether, including the thirty bundles of fentanyl/heroin that defendant AGUAYO-GARCIA distributed to CHS-6 earlier in the day and the forty bundles of fentanyl/heroin that he distributed to CHS-6 at approximately 6:44 p.m., defendant AGUAYO-GARCIA distributed to CHS-6 a total of 1,119 packets of fentanyl/heroin, each stamped “GRINCH,” weighing a total of approximately 55.2 grams.

92. On or about July 31, 2025:

a. At approximately 6:46 p.m., defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” spoke on the phone with defendant SANDINO JOSE HIDALGO GENAO, a/k/a “Domi.” Defendant ROMAN-MONTANEZ said that the Weymouth DTO was “dry already” and needed more “Ric Flair,” referring to a stamp of fentanyl/heroin packaged by defendant HIDALGO GENAO. Defendant HIDALGO GENAO said he was “working on that” and was already “preparing it.”

b. At approximately 6:49 p.m., defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin,” called defendant SANDINO JOSE HIDALGO GENAO and asked how long defendant HIDALGO GENAO would need to complete the re-up of Ric Flair. Defendant HIDALGO GENAO answered that he needed about fifteen minutes, and defendant MORALES-GARCIA can head over to get it.

93. On or about August 1, 2025:

a. At approximately 10:52 a.m., defendant SANDINO JOSE HIDALGO GENAO, a/k/a “Domi,” spoke on the phone with defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin,” about the supply of fentanyl/heroin packets that defendant HIDALGO GENAO had worked on the night before. Defendant MORALES-GARCIA said that

third parties are saying that the “Ric Flair” (i.e., fentanyl/heroin mixture) is too strong. Defendant HIDALGO GENAO said that he has not changed anything and that he uses the same table to make “Ric Flair” that he also uses to make “Grinch,” and then says that he will prepare the next batch differently.

b. At approximately 4:15 p.m., defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” spoke on the phone with defendant SANDINO JOSE HIDALGO GENAO and complained that “customers were leaving” because defendant HIDALGO GENAO made the fentanyl/heroin mixture too strong. Defendant HIDALGO GENAO conveyed that he would remedy the situation.

94. On or about August 5, 2025:

a. At approximately 7:04 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant LUIS CRUZ. Defendant AGUAYO-GARCIA said that he was waiting to go to the block due to police presence, and asked defendant CRUZ to work for him. Defendant CRUZ agreed. Defendant CRUZ said he had “five more bags” of controlled substances to finish selling and then described for defendant AGUAYO-GARCIA other quantities of controlled substances available for distribution on the block.

b. At approximately 1:25 p.m., defendant JOSUE ONEIL ORTIZ-BETANCOURT, a/k/a “Oneil” stored 77 packets of fentanyl, stamped “OCHO BLANCO,” in a water drain in front of 3089 Potter Street, in Philadelphia, so that he could make street sales on behalf of the Weymouth DTO, and then retrieved some packets from the drain and engaged in a hand-to-hand drug sale with a buyer.

c. At approximately 2:09 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante,” and

told LEVANTE-MEDINA to bring him “13,” referring to quantities of controlled substances to be sold by the Weymouth DTO. Defendant AGUAYO-GARCIA warned defendant LEVANTE-MEDINA to be alert because police officers had recently arrested a number of individuals on Potter Street.

d. At approximately 2:12 p.m., defendant LUIS LEVANTE-MEDINA arrived in his black Ford Taurus at the garage located at 3326 Rorer Street, to obtain supplies of controlled substances to be provided to the Weymouth DTO for sale.

e. At approximately 2:19 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS LEVANTE-MEDINA and told him that AGUAYO-GARCIA was coming by with “13 tickets,” referring to drug proceeds that be used to purchase new installments of controlled substances.

f. At approximately 2:22 p.m., defendant KELVIN AGUAYO-GARCIA arrived in his black Ford Taurus at the garage located at 3326 Rorer Street.

g. At approximately 2:23 p.m., defendant LUIS LEVANTE-MEDINA exited the garage and met with defendant KELVIN AGUAYO-GARCIA at his vehicle.

h. At approximately 2:32 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant LUIS CRUZ and told him that “it’s almost there”—referring to a “new package”—and that “Diamante” (i.e., defendant LUIS LEVANTE-MEDINA) was almost where they are.

i. At approximately 2:35 p.m., defendant LUIS LEVANTE-MEDINA left the Rorer Street garage on a bike, biked to the 3100 block of Weymouth Street, and then made a transaction with an individual unknown to the grand jury.

j. At approximately 3:12 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” and told him that he was on his way to “take out 50 for Grande” (i.e., defendant DAVID LOPEZ-BORIA) because “Grande” was “dry” (i.e., out of drugs to sell).

k. At approximately 3:24 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant RAMON ROMAN-MONTANEZ, and told him “Grande” (i.e., defendant DAVID LOPEZ-BORIA) wanted to go home. Defendant ROMAN-MONTANEZ replied that “Panza” (i.e., Co-Conspirator 12) starts at 3:00 p.m. A few minutes later, defendant AGUAYO-GARCIA confirmed for defendant ROMAN-MONTANEZ that “Panza” (i.e., Co-Conspirator 12) was on his way and AGUAYO-GARCIA “took out 50” for him.

l. At approximately 5:00 p.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant JOEL CARRILLO-CRESPO, a/k/a “Jowey,” about recent police surveillance in the area and about drug proceeds.

m. Between approximately 5:44 p.m. and 7:32 p.m., defendants LUIS LEVANTE-MEDINA, JOEL CARRILLO-CRESPO, a/k/a “Jowey,” and JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco,” together spent time in in the garage located at 3326 Rorer Street, in Philadelphia.

95. On or about August 7, 2025:

a. At approximately 6:59 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant LUIS CRUZ. Defendant CRUZ and defendant AGUAYO-GARCIA discussed the amount of drug proceeds that needed to be collected, and defendant AGUAYO-GARCIA stated that defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” gave defendant AGUAYO-GARCIA “four.”

b. At approximately 7:15 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant LUIS CRUZ. Defendant AGUAYO-GARCIA asked if everything was hidden away because the police were after defendant CRUZ because defendant CRUZ had removed his ankle monitor.

c. At approximately 8:16 a.m., defendant KELVIN AGUAYO-GARCIA spoke on the phone with defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin.” Defendant AGUAYO-GARCIA told defendant MORALES-GARCIA to pick up “Riflay,” referring to a stamp of fentanyl/heroin packages, for sale on the block. Defendant MORALES-GARCIA acknowledged.

d. At approximately 8:28 a.m., defendant ELIUD OMAR MORALES-GARCIA spoke on the phone with defendant SANDINO JOSE HIDALGO GENAO, a/k/a “Domi.” Defendant MORALES-GARCIA said he would be there in 15 minutes.

e. Between approximately 8:30 a.m. and 9:20 a.m., defendant ELIUD OMAR MORALES-GARCIA met with defendant SANDINO JOSE HIDALGO GENAO in the area of Wissinoming Park, which is about half-a-mile from 6217 Tackawanna Street, in Philadelphia, so that defendant MORALES-GARCIA could obtain additional supplies of fentanyl/heroin packets to be sold by the Weymouth DTO. After this meeting, defendant MORALES-GARCIA proceeded to the 3100 block of Weymouth Street.

f. At approximately 7:45 p.m., defendant ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” sold Buyer 10, a person known to the grand jury, six packets of suspected fentanyl, stamped “DONALD TRUMP,” and sold Buyer 11, a person known to the grand jury, four flip-top containers of suspected cocaine base (“crack”), on the 600 block of East Wishart Street, in Philadelphia.

96. On or about August 8, 2025:

a. At approximately 7:45 a.m., defendant LUIS CRUZ possessed, with the intent to distribute, two orange flip-top containers of cocaine base (“crack”), and \$883 in drug proceeds, on his person.

b. That same morning, stored inside of a trash can in front of 3118 Weymouth Street, defendant LUIS CRUZ and other members of the Weymouth DTO possessed, for the purpose of distribution, four packets of fentanyl/heroin stamped “Grinch,” and 20 orange flip-top containers of cocaine base (“crack”).

c. That same morning, stored inside of 3115 Weymouth Street, defendant LUIS CRUZ and other members of the Weymouth DTO also possessed, for the purposes of distribution, 630 total packets of fentanyl/heroin, stamped “Ric Flair,” 150 total packets of fentanyl/heroin, stamped “GRINCH,” and 196 additional orange flip-top containers, containing cocaine base (“crack”).

d. At approximately 8:52 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante.” Defendant AGUAYO-GARCIA instructed defendant LEVANTE-MEDINA to make headway because the police took “the entire stash” earlier that morning. Defendant AGUAYO-GARCIA said the police took “thirteen bundles from down the block” and “fifty-seven bundles of slow from the top of the block.”

e. At approximately 10:37 a.m., defendant KELVIN AGUAYO-GARCIA called defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo.” Defendant ROMAN-MONTANEZ told defendant AGUAYO-GARCIA that they didn’t have “slow,” referring to fentanyl/heroin. Defendant AGUAYO-GARCIA said that they had “Grinch” left and that

defendant AGUAYO-GARCIA would call defendant ELIUD OMAR MORALES-GARCIA to “bring some,” referring to quantities of fentanyl/heroin to be sold by the Weymouth DTO.

f. At approximately 10:39 a.m. and again at 10:42 a.m., defendant KELVIN AGUAYO-GARCIA, spoke with defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin,” on the phone. Defendant AGUAYO-GARCIA asked defendant MORALES-GARCIA to go look for “slow” because the police “took all of it from up there.” Defendant AGUAYO-GARCIA explained that the police had “got Luis” (i.e., defendant LUIS WILLIAMS) with “67 bundles.” Defendants AGUAYO-GARCIA and MORALES-GARCIA went on to discuss how “Grande” (i.e., defendant DAVID LOPEZ-BORIA) had made it too easy for the police by keeping so much of the stash—rather than just “five or so”—inside the mattress in the kitchen.

97. On or about August 10, 2025, inside of 6217 Tackawanna Street, in Philadelphia, an address used by the Weymouth DTO to package narcotics, defendants SANDINO JOSE HIDALGO GENAO, a/k/a “Domi,” JOSE CANDIDO HIDALGO GENAO, and JIANNI CRUZ SANTOS possessed with the intent to distribute on behalf of the Weymouth DTO approximately 2,048 grams of a mixture and substance containing fentanyl, drug paraphernalia, and various stamps including “OCHO BLANCO,” “RIC FLAIR,” “DEBO,” “HORSE POWER,” “CHUCKY,” “SHUMA,” “LITTLE DEVIL,” “STIFF DICK,” “TRIDENT,” “JUNKIE LUV,” “SANTA,” “GRINCH,” and “HUNCHO.”

98. On or about August 12, 2025:

a. Between approximately 4:30 p.m. and 4:43 p.m., defendants JAVIER RESTO-BERRIOS, a/k/a “Chicken,” and KELVIN AGUAYO-GARCIA, a/k/a “Negro,” met with CHS-6 on the 3100 block of Weymouth Street, near the entrance to 3140 Weymouth Street, and

took an order of narcotics from CHS-6 for 50 bundles of “Grinch,” referring to fentanyl/heroin, and “15 rocks,” referring to cocaine base (“crack”).

b. At approximately 4:51 p.m., defendant KELVIN AGUAYO-GARCIA entered 3150 Weymouth Street, in order to retrieve some or all of the controlled substances ordered by CHS-6.

c. At approximately 4:57 p.m., defendants JAVIER RESTO-BERRIOS, KELVIN AGUAYO-GARCIA and JOHN DAVID LOPEZ-BORIA, a/k/a “Grande,” met with CHS-6 inside the “bunker” located at 3153 Weymouth Street. Once inside, defendants RESTO-BERRIOS and AGUAYO-GARCIA distributed to CHS-6 forty-three bundles, containing a total of 687 packets of fentanyl/heroin, each stamped “GRINCH,” weighing a total of approximately 34 grams, ten bundles, containing a total of 141 total of fentanyl/heroin, each stamped “Ric Flair,” weighing a total of approximately 5.12 grams, as well as 420 flip-top containers containing cocaine base (“crack”), weighing a total of approximately 48.2 grams, in exchange for \$ 5,000. Defendant LOPEZ-BORIA assisted with the calculation of the price.

d. At approximately 5:25 p.m., defendant JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco,” spoke on the phone with defendant CHAYANNE HERRERA, a/k/a “Cito.” Defendant MORALES NIEVES told defendant HERRERA that he is supposed to be “looking out for things” at the Rorer Street garage on defendant MORALES NIEVES’ behalf, and that defendant HERRERA needs to be more careful about drinking alcohol and/or allowing third parties into the garage.

e. At approximately 7:43 p.m., defendant KELVIN AGUAYO-GARCIA spoke with defendant ELIUD OMAR MORALES-GARCIA, a/k/a “Chochin,” on the phone. Defendant AGUAYO-GARCIA said he “made money today” because he sold 53 bundles of

Grinch (referring to fentanyl) and 15 “chickens of rocks” (referring to cocaine base (“crack”)). Defendant MORALES-GARCIA then said that “Viejo” (i.e., defendant RAMON ROMAN-MONTANEZ) said “it,” referring to new supplies of controlled substances, arrives tomorrow. Defendant AGUAYO-GARCIA said that the supply would actually arrive that night, and that defendant ROMAN-MONTANEZ had obtained a packaging operation that the Weymouth DTO had used in the past—which had packaged the “Santa Muerte” brand of fentanyl—and that defendant MORALES-GARCIA would help deliver it.

99. On or about August 13, 2025:

a. At approximately noon, defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante,” possessed a black Taurus, Model G2C semi-automatic pistol, bearing serial number TMR 12764, with an extended magazine containing 20 live rounds of ammunition and a magazine containing 10 live rounds of ammunition, knowing he had previously been convicted in a court of Puerto Rico of a crime punishable by imprisonment for a term exceeding one year.

b. At approximately 12:45 p.m., inside 3150 Weymouth Street, an address used by the Weymouth DTO to stash controlled substances and drug proceeds, defendants RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” KELVIN AGUAYO-GARCIA, a/k/a “Negro,” and the Weymouth DTO possessed with the intent to distribute approximately (i) numerous packets of fentanyl/heroin, including with stamps “LITTLE DEVIL,” “WW,” and “MICHAEL MEYERS,” weighing a total of approximately 5.45 grams; (ii) hundreds of baggies, packets, and conical vials of cocaine, weighing a total of approximately 1,280 grams, and (iii) vials as well as bulk cocaine base (“crack”), weighing a total of approximately 136 grams..

c. At approximately 12:45 p.m., on the front porch of 3152 Weymouth Street and inside of 3152 Weymouth Street, an address used by the Weymouth DTO to stash

controlled substances and drug proceeds and the residence of defendants RAMON ROMAN-MONTANEZ and NANCY RIOS-VALENTIN, defendants ROMAN-MONTANEZ, NANCY RIOS-VALENTIN, and the Weymouth DTO possessed with the intent to distribute approximately (i) eight bundles, with a total of 112 packets of fentanyl/heroin, each stamped “RIC FLAIR,” weighing a total of approximately six grams; (ii) bulk cocaine base (“crack”) and packaged cocaine base (“crack”), weighing a total of approximately 66.28 grams; (iii) ledger sheets; and (iv) over \$24,000 cash drug proceeds.

d. At approximately 12:45 p.m., inside 3153 Weymouth Street, an address used by the Weymouth DTO to stash controlled substances, members of the Weymouth DTO possessed with the intent to distribute approximately (i) 1,695 zip-lock packets containing fentanyl/heroin, stamped with varying stamps, to include “RIC FLAIR,” “DEBO,” and other stamps, weighing a total of approximately 64.9 grams; (ii) 775 green plastic capsules containing cocaine base (“crack”), weighing a total of approximately 101.5 grams; (iii) bulk cocaine base (“crack”), weighing a total of approximately 15.935 grams; (iv) drug paraphernalia including unused pink, green, blue, orange, and other plastic capsules known as “trashcans,” used for packaging cocaine base (“crack”); and (v) numerous rounds of loose ammunition of various calibers, including AK 47 rounds.

e. Inside the garage at 3326 Rorer Street, an address used by the Weymouth DTO to stash controlled substances, defendants JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco,” LUIS LEVANTE-MEDINA, a/k/a “Diamante,” CHAYANNE HERRERA, a/k/a “Cito,” and the Weymouth DTO possessed with the intent to distribute approximately (i) 361 flip-top containers of cocaine base (“crack”), weighing a total of approximately 36 grams; (ii) 1,703 packets of powder cocaine, weighing a total of approximately

463.5 grams; (iii) drug paraphernalia, including orange plastic capsules for cocaine base (“crack”); (iv) an assortment of ammunition and firearm accessories, including a box of Sellier & Bellot .40 caliber handgun ammunition with six live rounds of ammunition, a loose live round of 9 mm Luger ammunition, a box of 5.56 live rounds of ammunition, two AK-47 40 round magazines, one 60 round AR/M4 magazine, one box of 9 mm live rounds of ammunition, and one blue box of 9 mm live ammunition.

f. At approximately 2:13 p.m., defendant CHAYANNE HERRERA, a/k/a “Cito,” spoke on the phone with defendant JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco.” Defendant MORALES NIEVES stated that the “church”—referring to the garage at 3326 Rorer Street—had been raided by the police. Defendant MORALES NIEVES said that he hoped the police did not find “the ten that they put in the stairs,” and that he and the others had left at around midnight and cleaned everything up, but the “trash bag was still there.”

g. At approximately 2:25 p.m., defendant LUIS LEVANTE-MEDINA, a/k/a “Diamante,” spoke on the phone with defendant JOSE ANTONIO MORALES NIEVES. Defendant LEVANTE-MEDINA said he was stopped for questioning by the police. Defendant LEVANTE-MEDINA also stated that he threw away the gun and the magazine by the small garage, when he took a right at the stop sign on the corner. Defendant MORALES NIEVES questioned defendant LEVANTE-MEDINA about what happened with the police, what they seized, and what was said the police. Defendant LEVANTE-MEDINA said that “there was not much there” (i.e., in the garage) for the police to take and that he was surprised that when the police went to check his white car in the garage, they did not “find the crack in the car.”

h. At approximately 3:42 p.m., defendant LUIS LEVANTE-MEDINA spoke on the phone with defendant JOSE ANTONIO MORALES NIEVES. Defendant

LEVANTE-MEDINA stated that when he returns to look for the gun, he will have to give something to the man at the garage where he threw it.

i. At approximately 5:46 p.m., defendant LUIS LEVANTE-MEDINA spoke on the phone with defendant JOSE ANTONIO MORALES NIEVES. Defendant LEVANTE-MEDINA mentioned money that was hidden above the stove in the Rorer Street garage. Defendant MORALES NIEVES stated that he was told that they supposedly took “Ramon.” Defendant LEVANTE-MEDINA later says that “Viejo’s adventures are over,” he is going to do time, and it might look like “Viejo” was the boss, which works in their favor.

100. On or about September 8, 2025, at approximately 11:36 p.m., defendant ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie,” exchanged text messages with an individual unknown to the grand jury. The unknown individual wanted to know if defendant GONZALEZ-CLAUDIO could only provide “bundles” or if defendant GONZALEZ-CLAUDIO could obtain “quantity.” The unknown individual specifically requested from defendant GONZALEZ-CLAUDIO a stamp utilized by the Weymouth DTO, “Frank White.”

101. On or about September 10, 2025:

a. Between approximately 6:05 p.m. and 6:30 p.m., Weymouth DTO members, unknown to the grand jury, made hand-to-hand street sales of fentanyl/heroin to three different buyers in the area of 3000 Potter Street, in Philadelphia. All three buyers were stopped by Philadelphia police officers and found to have one or two packets of suspected fentanyl/heroin, stamped “OCHO BLANCO,” in their possession. To serve these and other clients, the Weymouth DTO street-level dealers used a water drain in front of 3089 Potter Street, and a burgundy 2013 Honda CRV that was parked on 3000 Potter Street, as temporary storage locations for “OCHO BLANCO”-stamped fentanyl/heroin.

b. At approximately 6:30 p.m., Philadelphia police officers seized 62 packets of fentanyl/heroin, each stamped “OCHO BLANCO,” from the storage drain in front of 3089 Potter Street, and eighty-five bundles, containing a total of 1360 packets of fentanyl/heroin, each stamped “OCHO BLANCO,” from the Honda CRV parked on 3000 Potter Street.

102. On or about September 11, 2025:

a. At approximately 6:44 p.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” took an order of “25” bundles of fentanyl/heroin from CHS-6, on the 3100 block of Weymouth Street. Shortly thereafter, CHS-6 expanded his order to also include “50” bundles of the brand sold on Potter Street, referring to the OCHO BLANCO stamp.

b. At approximately 6:50 p.m., CHS-6 asked Co-Conspirator 12 if he could help CHS-6 obtain the bundles of fentanyl from Potter Street. Co-Conspirator 12 then called defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” to convey CHS-6’s order for 50 bundles and ask for the price. After speaking with defendant MATTEI-RODRIGUEZ, who stated that he “had a loss” recently, Co-Conspirator 12 told CHS-6 that the price was \$60 per bundle. Co-Conspirator 12 remarked to CHS-6 that the police had taken recently “90 chickens” from “Nachito” (referring to Co-Conspirator 24), a regular caseworker for the DTO on Potter Street who reported to defendant MATTEI-RODRIGUEZ.

c. At approximately 7:00 p.m., inside of 3140 Weymouth Street, defendant JAVIER RESTO-BERRIOS distributed to CHS-6 twenty-five bundles, containing a total of 351 packets of fentanyl, each stamped “FRANK WHITE,” weighing a total of approximately 11.27 grams, in exchange for \$1,500.

d. At approximately 7:19 p.m., defendant ELLIOT MATTEI-RODRIGUEZ spoke with CHS-6, who was still on the 3100 block of Weymouth Street, waiting for

the rest of the bundles of fentanyl/heroin with the “OCHO BLANCO” stamp sold on Potter Street. Defendant MATTEI-RODRIGUEZ told CHS-6, with respect to these bundles, “I can’t give them to you cheaper because they got to me yesterday.”

e. At approximately 7:41 p.m., a white Chevrolet Equinox arrived on the block, being driven by Co-Conspirator 28, a person known to the grand jury, and in which Co-Conspirator 29, a person known to the grand jury, was a passenger. Co-Conspirator 29 then exited the Equinox and handed CHS-6 approximately 802 packets of fentanyl, each stamped “OCHO BLANCO,” weighing a total of approximately 65 grams, in exchange for \$3,000.

103. On or about September 19, 2025:

a. Between approximately 8:10 a.m. and 8:34 a.m., Co-Conspirator 30, a person known to the grand jury, distributed numerous packets of fentanyl stamped “Frank White,” to each of Buyers 12, 13, and 14, all persons known to the grand jury, on the 3100 block of Weymouth Street.

b. At approximately 8:45 a.m., defendant JAVIER RESTO-BERRIOS, a/k/a “Chicken,” reached into a trash can located in the vicinity of 3140 Weymouth Street and retrieved controlled narcotics that he handed to defendant ANGEMILL GONZALEZ-CLAUDIO, a/k/a “Angel,” a/k/a “Angie.” Defendant GONZALEZ-CLAUDIO then walked into 3115 Weymouth Street to stash the controlled narcotics.

c. At approximately 9:01 a.m., stored inside of 3115 Weymouth Street, defendant GONZALEZ-CLAUDIO and other members of the Weymouth DTO possessed, for the purposes of distribution, 70 orange flip-top containers containing cocaine base (“crack”).

d. At approximately 11:19 a.m., Co-Conspirator 12 took an order over the phone for packets of fentanyl/heroin with the “OCHO BLANCO” stamp from CHS-6.

e. At approximately 11:51 a.m., defendant ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” stood on 3100 Weymouth Street and confirmed with CHS-6 the order for packets of fentanyl/heroin, stamped “OCHO BLANCO,” that CHS-6 had placed with Co-Conspirator 12. Defendant MATTEI-RODRIGUEZ directed CHS-6 to receive the controlled substances from an individual unknown to the grand jury.

f. At approximately 12:15 p.m., defendants ELLIOT MATTEI-RODRIGUEZ, a/k/a “Elio,” and EDERICK RIVERA SANTIAGO-GONZALEZ, a/k/a “Negro,” a/k/a “Edri,” brought CHS-6 to 3000 Potter Street so that CHS-6’s order could be filled.

g. At approximately 12:20 p.m., Co-Conspirator 31, a person known to the grand jury, handed CHS-6 approximately 800 packets of fentanyl, each stamped “OCHO BLANCO,” in exchange for \$3,000.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JONATHAN TORRES and
EDERICK RIVERA SANTIAGO-GONZALEZ,
a/k/a “Negro,”
a/k/a “Edri,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 3.29 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 15, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOHN DAVID LOPEZ-BORIA,
a/k/a “Grande,”**

knowingly and intentionally distributed a mixture and substance weighing approximately 3.59 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 2, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JONATHAN TORRES and
ADELEDA GONZALEZ,
a/k/a “Moya,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 5.19 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 2, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
JOSE SANTANA-GONZALEZ,
a/k/a “Chipi,”
a/k/a “Chepo,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 2.46 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 3, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**SONIA RAMOS DE JESUS and
JOSUE ONEIL ORTIZ-BETANCOURT,
a/k/a “Oneil,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 2.55 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JOHN DAVID LOPEZ-BORIA,
a/k/a “Grande,” and
JOSE SANTANA-GONZALEZ,
a/k/a “Chipi,”
a/k/a “Chepo,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 2.4 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, and a mixture and substance weighing approximately 0.68 grams containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 14, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOSE SANTANA-GONZALEZ,
a/k/a “Chipi,”
a/k/a “Chepo,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 12.0 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, and a mixture and substance weighing approximately 0.9 grams containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 5, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JULIO JOSE RAMIREZ-DIAZ,
a/k/a “June,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance weighing approximately 4.5 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, and a mixture and substance weighing approximately 4.05 grams containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

Before defendant JULIO JOSE RAMIREZ-DIAZ, a/k/a “June” committed the offense charged in this count, defendant RAMIREZ-DIAZ had a final conviction for a serious drug felony, that is, a conviction on June 16, 2016, in the Commonwealth of Pennsylvania for the manufacture, delivery, or possession with intent to manufacture or deliver, a controlled substance in violation of 35 Pa. C.S.A. § 780-113 (a)(30), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the offense charged in this count.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 18, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOSE SANTANA-GONZALEZ,
a/k/a “Chipi,”
a/k/a “Chepo,”**

knowingly and intentionally distributed a mixture and substance weighing approximately 11.24 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 24, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
RICHARD CARTAGENA,
a/k/a “Richie,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 10.6 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 5, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOSUE ONEIL ORTIZ-BETANCOURT,
a/k/a “Oneil,”**

knowingly and intentionally distributed a mixture and substance weighing approximately 1.53
grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 5, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**RAMON ROMAN-MONTANEZ,
a/k/a “Viejo,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 7.76 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 9, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOSE SANTANA-GONZALEZ,
a/k/a “Chipi,”
a/k/a “Chepo,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 11.5 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ADELEDA GONZALEZ,
a/k/a “Moya”**

knowingly and intentionally distributed a mixture and substance weighing approximately 1.48 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 20, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMON ROMAN-MONTANEZ,
a/k/a “Viejo,” and
JAVIER RESTO-BERRIOS,
a/k/a “Chicken,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 7.75 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMON ROMAN-MONTANEZ,
a/k/a “Viejo,” and
JAVIER RESTO-BERRIOS,
a/k/a “Chicken,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 5.89 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 30, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOSE SANTANA-GONZALEZ,
a/k/a “Chipi,”
a/k/a “Chepo,”**

knowingly and intentionally distributed a mixture and substance weighing approximately 12.0 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, and a mixture and substance weighing approximately 16.89 grams containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**RICHARD CARTAGENA,
a/k/a “Richie,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance weighing approximately 25.7 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, 28 grams or more, that is, approximately 71.50 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and a mixture and substance weighing approximately 23.6 grams containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), (b)(1)(C).

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 14, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
JANDANIEL VELEZ-GONZALEZ,
a/k/a “Jan,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 8.46 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 18, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,”**

knowingly and intentionally distributed a mixture and substance weighing approximately 8.71
grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 18, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**KELVIN AGUAYO-GARCIA,
a/k/a “Negro,”**

knowingly and intentionally distributed a mixture and substance weighing approximately 5.36
grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 14, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
KELVIN AGUAYO-GARCIA,
a/k/a “Negro,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 17.49 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 16, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
JUAN GOMEZ-RESTO,
a/k/a “Pupo,”**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute, 400 grams or more, that is, approximately 449 grams, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 20, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**EDERICK RIVERA SANTIAGO-GONZALEZ,
a/k/a “Negro,”
a/k/a “Edri,” and
JOSUE ONEIL ORTIZ-BETANCOURT,
a/k/a “Oneil,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 5.53 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 20, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**EDERICK RIVERA SANTIAGO-GONZALEZ,
a/k/a “Negro,”
a/k/a “Edri,”**

knowingly and intentionally aided and abetted the distribution of a mixture and substance weighing approximately 20.15 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
KELVIN AGUAYO-GARCIA,
a/k/a “Negro,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 12.04 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
JUAN GOMEZ-RESTO,
a/k/a “Pupo,”**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute, 400 grams or more, that is, approximately 485 grams, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (“fentanyl”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 25, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
KELVIN AGUAYO-GARCIA,
a/k/a “Negro,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 37.4 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 30, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**ELIUD OMAR MORALES-GARCIA,
a/k/a “Chochin,”
KELVIN AGUAYO-GARCIA,
a/k/a “Negro,” and
SANDINO JOSE HIDALGO GENAO,
a/k/a “Domi,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 40 grams or more, that is, approximately 55.2 grams, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 30, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**KELVIN AGUAYO-GARCIA,
a/k/a “Negro,”**

knowingly and intentionally distributed 28 grams or more, that is, approximately 32.4 grams, of a mixture and substance containing a detectable amount cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 8, 2025, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

LUIS CRUZ

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute, a mixture and substance containing a detectable amount of N-
phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title
18, United States Code, Section 2.

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**SANDINO JOSE HIDALGO GENAO,
a/k/a “Domi,”
JOSE CANDIDO HIDALGO GENAO, and
JIANNI CRUZ SANTOS**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 400 grams or more, that is, approximately 2,048 grams, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 12, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
KELVIN AGUAYO-GARCIA,
a/k/a “Negro,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance weighing approximately 39.1 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, and 28 grams or more, that is, approximately 48.2 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2025, inside 3152 Weymouth Street, Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMON ROMAN-MONTANEZ,
a/k/a “Viejo,” and
NANCY RIOS-VALENTIN**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance weighing approximately six grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, and 28 grams or more, that is, approximately 66.28 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2025, inside 3150 Weymouth Street, Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMON ROMAN-MONTANEZ,
a/k/a “Viejo,” and
KELVIN AGUAYO-GARCIA,
a/k/a “Negro,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with the intent to distribute of, a mixture and substance weighing approximately 5.45 grams containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, 28 grams or more, that is, approximately 136 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and 500 grams or more, that is, approximately 1,280 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JOSE ANTONIO MORALES NIEVES,
a/k/a “Flaco,”
LUIS LEVANTE-MEDINA,
a/k/a “Diamante,” and
CHAYANNE HERRERA,
a/k/a “Cito,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 28 grams or more, that is, approximately 36 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and a mixture and substance weighing approximately 463 grams of a containing a detectable amount of cocaine, a Schedule II controlled substance.

Before defendant JOSE ANTONIO MORALES NIEVES, a/k/a “Flaco” committed the offense charged in this count, defendant MORALES NIEVES had a final conviction for a serious violent felony, that is, a conviction on December 17, 2004, in the Eastern District of Pennsylvania for Hobbs Act Robbery and using a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Section 1951 and Title 18, United States Code, Section 924(c), for which he served more than 12 months of imprisonment.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 11, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JAVIER RESTO-BERRIOS,
a/k/a “Chicken,” and
ELLIOT MATTEI-RODRIGUEZ,
a/k/a “Elio,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 40 grams or more, that is, approximately 76.49 grams, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LUIS LEVANTE-MEDINA,
a/k/a “Diamante,”**

knowing he had previously been convicted in a court in the Commonwealth of Puerto Rico of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a black Taurus semi-automatic pistol, model G2C, bearing serial number TMR12764, and the firearm was in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. Count One, Overt Acts, Paragraphs 6(d), 72(b), and 86(a) are incorporated herein.

2. From at least on or about April 2018 through on or about August 13, 2025, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMON ROMAN-MONTANEZ,
a/k/a “Viejo,” and
NANCY RIOS-VALENTIN**

did knowingly and willfully conspire together and with other persons known and unknown to the grand jury, to commit the following offenses against the United States, to wit: knowingly sponsoring and exhibiting an animal fighting venture, in violation of Title 7, United States Code, Section 2156(a)(I); and knowingly selling, purchasing, possessing, training, transporting, delivering, or receiving any rooster for purposes of having the rooster participate in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(b); and that in both cases, such a venture and sale, purchase, possession, training, transportation, delivery, or receipt was in or affecting interstate or foreign commerce.

MANNER AND MEANS

It was part of the conspiracy that the defendants and their co-conspirators would and did:

1. Maintain and exercise control over a property at 3150 Weymouth Street, Philadelphia, Pennsylvania, to serve as the main staging area for housing and training roosters involved in the animal fighting venture and serve as a location for hosting rooster fights;

2. Maintain and exercise control over a property at 3152 Weymouth Street, Philadelphia, Pennsylvania, to serve as a location for housing roosters, chickens and chicks, involved in the animal fighting venture;
3. Purchase roosters and chickens for use in rooster fighting competitions;
4. Train and breed chickens and roosters for participation in rooster fighting competitions; and
5. Provide funding for the expenses associated with the ongoing animal fighting venture, including food, medicine, and items used to train the roosters, some of which were purchased through channels of interstate commerce.

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, at least one of the following overt acts, among others, was committed by the defendants and other conspirators in the Eastern District of Pennsylvania and elsewhere:

1. On or about April 17, 2018:
 - a. Defendants NANCY RIOS-VALENTIN and RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” possessed eleven roosters, ten hens and nine chicks at 3152 Weymouth Street.
 - b. Defendants ROMAN-MONATANEZ and NANCY RIOS-VALENTIN removed the “combs” or “wattles” of the roosters, a process known as “dubbing,” to give the roosters an advantage in fighting because these appendages can be targets for opponents to grab.

2. On or about March 27, 2022, defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” using his eBay account, purchased a “handmade synthetic leather dummy for roosters/mona para gallos,” for the purpose of training the roosters to fight.

3. On or about March 28, 2022, defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” using his eBay account, purchased “[v]itamina para polloitsos-vitofarma babybiotic 226gr vitamin probiotic exp 6/24,” medicine used for the birds’ health so that they could be sponsored or exhibited in an animal fighting venture.

4. On or about January 11, 2024, defendant RAMON ROMAN-MONTANEZ, a/k/a “Viejo,” using his eBay account, purchased, “[l]iquid supplement for birds, increase fertility, multivitamins, minerals 2x1 pack,” for the purpose of breeding more birds for fighting.

5. On or about May 31, 2025, at approximately 4:45 p.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” called defendant NANCY RIOS-VALENTIN on the phone, and conveyed to her that she should tell “Viejo,” referring to defendant RAMON ROMAN-MONTANEZ, that the roosters were out of green pills. One minute later, at approximately 4:46 p.m., defendant AGUAYO-GARCIA spoke on the phone with defendant ROMAN-MONTANEZ and directly told him that the roosters did not have “any more green pills.” Defendant ROMAN-MONTANEZ acknowledged. Defendant AGUAYO-GARCIA then stated that he was going to come pick up “two tickets” from defendant ROMAN-MONTANEZ, referring to quantities of drug-trafficking proceeds.

6. On or about June 1, 2025, at approximately 7:29 a.m., defendant KELVIN AGUAYO-GARCIA, a/k/a “Negro,” spoke on the phone with defendant RAMON ROMAN-MONTANEZ, and reminded him that the “Gallo” (i.e., rooster) needed “the green pills today.”

7. From in or about April 2018 through August 13, 2025, at various times, the exact dates being unknown to the grand jury, defendants RAMON ROMAN-MONTANEZ and NANCY RIOS-VALENTIN, and others known and unknown to the grand jury continued operation of the animal fighting venture at 3150 Weymouth Street and hosted cock fights on the property. Many of these fights were held in the basement of the property. Some of the participants were members of the Weymouth Street DTO.

In violation of Title 18, United States Code, Section 371.

NOTICE OF FORFEITURE 1

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 846 and 841, set forth in this indictment, defendants

JOSE ANTONIO MORALES NIEVES,
a/k/a "Flaco,"
RAMON ROMAN-MONTANEZ,
a/k/a "Viejo,"
NANCY RIOS-VALENTIN,
JOEL CARRILLO-CRESPO,
a/k/a "Jowey,"
LUIS LEVANTE-MEDINA,
a/k/a "Diamante,"
CHAYANNE HERRERA,
a/k/a "Cito,"
KELVIN AGUAYO-GARCIA,
a/k/a "Negro,"
ELLIOT MATTEI-RODRIGUEZ,
a/k/a "Elio,"
SANDINO JOSE HIDALGO GENAO,
a/k/a "Domi"
JOSUE ONEIL ORTIZ-BETANCOURT,
a/k/a "Oneil,"
ANGEL RIOS-VALENTIN,
JUAN GOMEZ-RESTO,
a/k/a "Pupo,"
JAVIER RESTO-BERRIOS,
a/k/a "Chicken,"
RICHARD CARTAGENA,
a/k/a "Richie,"
ELIUD OMAR MORALES-GARCIA,
a/k/a "Chochin,"
ANGEMILL GONZALEZ-CLAUDIO,
a/k/a "Angel,"
a/k/a "Angie,"
JOHN DAVID LOPEZ-BORIA,
a/k/a "Grande,"
JONATHAN TORRES,
EDERICK RIVERA SANTIAGO-GONZALEZ,
a/k/a "Negro,"
a/k/a "Edri,"
JANDANIEL VELEZ-GONZALEZ,

a/k/a "Jan,"
WILFRED CASTILLO,
a/k/a "Domi,"
HECTOR VEGA-MELENDEZ,
a/k/a "Tito,"
JULIO JOSE RAMIREZ-DIAZ,
a/k/a "June,"
CARLA DIAZ-RESTO,
a/k/a "Karla,"
MAYRA MOLINA DEJESUS,
a/k/a "Rubia,"
JAIME OTERO-RODRIGUEZ,
a/k/a "Pilon,"
JOSE SANTANA-GONZALEZ,
a/k/a "Chipi,"
a/k/a "Chepo,"
LUIS WILLIAMS,
a/k/a "Prendi Pas,"
SONIA RAMOS DE JESUS,
ADELEDA GONZALEZ,
a/k/a "Moya,"
LUIS CRUZ,
JOSE CANDIDO HIDALGO GENAO, and
JIANNI CRUZ SANTOS

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to
commit, or to facilitate the commission of, such violations, including but not limited to:

- i. 3110 Weymouth Street;
- ii. 3115 Weymouth Street;
- iii. 3116 Weymouth Street;
- iv. 3125 Weymouth Street;
- v. 3126 Weymouth Street;
- vi. 3131 Weymouth Street;
- vii. 3132 Weymouth Street;
- viii. 3133 Weymouth Street;
- ix. 3136 Weymouth Street;
- x. 3137 Weymouth Street;
- xi. 3140 Weymouth Street;
- xii. 3150 Weymouth Street;
- xiii. 3151 Weymouth Street;
- xiv. 3152 Weymouth Street;

- xv. 3153 Weymouth Street;
- xvi. 3154 Weymouth Street;
- xvii. a Taurus PT99, AF 9mm semi-automatic pistol, with 16 live rounds of ammunition;
- xviii. a Smith & Wesson .38 Special revolver, bearing serial number #J75447;
- xix. a Ruger LC9, 9mm semi-automatic pistol, bearing serial number #321-15519, with 10 live rounds of ammunition;
- xx. a box of .40 caliber ammunition;
- xxi. a box of .38 special ammunition;
- xxii. two black magazines;
- xxiii. a black and brown Draco AK 47, 7.62 caliber semi-automatic rifle, bearing serial number DR-8262-10, loaded with 31 live rounds of ammunition;
- xxiv. a black and green AR-15, aero model X15 semi-automatic rifle, bearing serial number X257462, with a double-drum magazine that was loaded with 80 live rounds of ammunition;
- xxv. a Pioneer Arms Co. 7.62 caliber semi-automatic pistol commonly referred to as a "Draco" with serial number PAC115804221;
- xxvi. a Glock .40 caliber semi-automatic pistol, bearing serial number BZMK804;
- xxvii. a box of .45 caliber ammunition;
- xxviii. Polymer80 Inc., Model PFC940, .40 caliber S&W, attached to a Glock 23 Austria slide bearing serial number HBE973, loaded with 14 live rounds of ammunition;
- xxix. Hi-Point, Model 995 semiautomatic rifle, bearing serial number F120900;
- xxx. a Sig Sauer 9mm semi-automatic pistol, bearing serial number 26C069994;
- xxxi. a Glock 26, 9mm semi-automatic pistol, bearing serial number #BGXC458;
- xxxii. a Keltec 9mm semi-automatic pistol, bearing serial number RAF95;
- xxxiii. a Glock 23 Austria, .40 caliber semi-automatic pistol, bearing serial number 6YB992, loaded with an extended magazine containing 28 rounds;
- xxxiv. a Glock 17 Austria, 9x19 semi-automatic pistol, bearing serial number XW200, loaded with an extended magazine containing 22 live rounds of ammunition;
- xxxv. Glock 30, .45 caliber semi-automatic pistol loaded with 24 live rounds of ammunition, with an obliterated serial number;

- xxxvi. a black Glock 22, .40 caliber semi-automatic pistol, bearing serial number HUL589, with three loaded magazines containing 45 live rounds of ammunition;
- xxxvii. a black Glock 23, .40 caliber semi-automatic pistol, bearing serial number BSRF744;
- xxxviii. a black Ruger EC9, 9mm semi-automatic pistol, with a magazine containing seven live rounds of ammunition;
- xxxix. a silver black handle Taurus Armas, .38 caliber revolver, bearing serial number AAL061522, loaded with eight live rounds of ammunition;
- xl. a black Taurus, Model G2C semi-automatic pistol, bearing serial number TMR 12764, with an extended magazine containing 20 live rounds of ammunition, and a magazine holding 10 live rounds of ammunition; and
- xli. an assortment of ammunition and firearm accessories, including a box of Sellier & Bellot .40 caliber handgun ammunition with six live rounds of ammunition, a loose live round of 9 mm Luger ammunition, a box of 5.56 live rounds of ammunition, two AK-47 40 round magazines, one 60 round AR/M4 magazine, one box of 9 mm live rounds of ammunition, and one blue box of 9 mm live ammunition recovered from 3326 Rorer Street, Philadelphia, PA.

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE 2

THE GRAND JURY FURTHER CHARGES THAT:

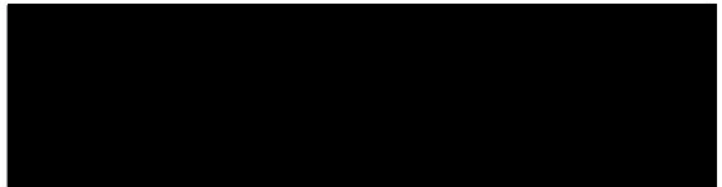
1. As a result of the violations of Title 18, United States Code, 922(g)(1), set forth in this indictment, defendant

**LUIS LEVANTE-MEDINA,
a/k/a "Diamante,"**

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of such offenses, including but not limited to: a black Taurus, Model G2C semi-automatic pistol, bearing serial number TMR 12764, with an extended magazine holding 20 live rounds of ammunition, and a magazine holding 10 live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:



Salvatore L. Astolfi for
DAVID METCALF
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JOSE ANTONIO MORALES NIEVES a/k/a "Flaco,"
RAMON ROMAN-MONTANEZ a/k/a "Viejo,"
NANCY RIOS-VALENTIN,
JOEL CARRILLO-CRESPO a/k/a "Jowey,"
LUIS LEVANTE-MEDINA a/k/a "Diamante,"
CHAYANNE HERRERA a/k/a "Cito,"
KELVIN AGUAYO-GARCIA a/k/a "Negro,"
ELLIOT MATTEI-RODRIGUEZ a/k/a "Elio,"
SANDINO JOSE HIDALGO GENAO a/k/a "Domi,"
JOSUE ONEIL ORTIZ-BETANCOURT a/k/a "Oneil,"
ANGEL RIOS-VALENTIN,
JUAN GOMEZ-RESTO a/k/a "Pupo,"
JAVIER RESTO-BERRIOS a/k/a "Chicken,"
RICHARD CARTAGENA a/k/a "Richie,"
ELIUD OMAR MORALES-GARCIA a/k/a "Chochin,"
ANGEMILL GONZALEZ-CLAUDIO a/k/a "Angel," a/k/a "Angie,"
JOHN DAVID LOPEZ-BORIA a/k/a "Grande,"
JONATHAN TORRES,
EDERICK RIVERA SANTIAGO-GONZALEZ a/k/a "Edri," a/k/a "Negro,"
JANDANIEL VELEZ-GONZALEZ a/k/a "Jan,"
WILFRED CASTILLO a/k/a "Domi,"
HECTOR VEGA-MELENDEZ a/k/a "Tito,"
JULIO JOSE RAMIREZ-DIAZ a/k/a "June,"
CARLA DIAZ-RESTO a/k/a "Karla,"
MAYRA MOLINA DEJESUS a/k/a "Rubia,"
JAIME OTERO-RODRIGUEZ a/k/a "Pilon,"
JOSE SANTANA-GONZALEZ a/k/a "Chipi," a/k/a "Chepo,"
LUIS WILLIAMS a/k/a "Prendi Pas,"
SONIA RAMOS DE JESUS,

ADELEDA GONZALEZ a/k/a "Moya,"
LUIS CRUZ,
JOSE CANDIDO HIGALDO
GENAO, and
JIANNI CRUZ SANTOS

INDICTMENT

Counts

- 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C) (conspiracy to distribute controlled substances– 1 count)
 - 21 U.S.C. § 841(a)(1), (b)(1)(A), (attempted possession with the intent to distribute 400 grams or more of fentanyl –2 counts)
 - 21 U.S.C. § 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C) (possession with the intent to distribute controlled substances – 4 counts)
 - 21 U.S.C. § 841(a)(1), (b)(1)(B), (b)(1)(C) (distribution of controlled substances – 20 counts)
 - 18 U.S.C. § 371 (conspiracy to sponsor or exhibit an animal and to possess an animal for an animal fighting venture – 1 count)
 - 18 U.S.C. § 922(g)(1) (felon in possession of a firearm – 1 count)
 - 18 U.S.C. § 2 (aiding and abetting)
 - Notices of forfeiture
-



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

INDICTMENT

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia

County: Philadelphia

City and State of Defendant: SEE REVERSE SIDE, SEE REVERSE SIDE

County: SEE REVERSE SIDE

Register number: SEE REVERSE SIDE

Place of accident, incident, or transaction: Eastern District of Pennsylvania

Post Office: Philadelphia, PA

County: Philadelphia, PA

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: No

Case Number: N/A

Judge: N/A

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

1. ☐ Antitrust
2. ☐ Income Tax and other Tax Prosecutions
3. ☐ Commercial Mail Fraud
4. ☒ Controlled Substances
5. ☐ Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
6. ☐ General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)

21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C) (conspiracy to distribute controlled substances— 1 count)

21 U.S.C. § 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C) (possession with the intent to distribute 400 grams or more of fentanyl—2 counts)

21 U.S.C. § 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C) (possession with the intent to distribute controlled substances – 4 counts)

21 U.S.C. § 841(a)(1), (b)(1)(B), (b)(1)(C) (distribution of controlled substances – 20 counts)

18 U.S.C. § 371 (conspiracy to sponsor or exhibit an animal and to possess an animal for an animal fighting venture – 1 count)

18 U.S.C. § 922(g)(1) (felon in possession of a firearm – 1 count)

18 U.S.C. § 2 (aiding and abetting); Notices of forfeiture:

DATE: 10/8/2025

s/ Jason D. Grenell

JASON D. GRESELL

Assistant United States Attorney

SARA SOLOW

File No. 2024R00060

U.S. v. JOSE ANTONIO MORALES NIEVES a/k/a “Flaco” et al. Assistant United States Attorney

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